

TOWN OF GRIMSBY



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PLANNING DEPARTMENT

May 31, 2019

Sent electronically

The Honourable Steve Clark
Minister of Municipal Affairs and Housing

Re: Town of Grimsby Comments, Proposed Bill 108 (More Homes, More Choice Act, 2019) and the Proposed Housing Supply Action Plan (ERO 019-0016, 019-0017, 019-0021)

Dear Minister,

Thank you for the opportunity to comment on Bill 108 (More Homes, More Choice Act, 2019) and the Proposed Housing Supply Action Plan.

Please accept this submission in response to Environmental Registry of Ontario (ERO) postings #019-0016, #019-0017, and #019-0021 on behalf of the Acting Director of Planning of the Town of Grimsby.

Further Consultation

The Town of Grimsby requests that the Province consult with municipalities prior to issuing any draft regulations associated with proposed Bill 108 before it comes into force, in order to allow municipalities to fully understand and be able to analyze the comprehensive impact of the Bill's proposed changes.

Parkland Dedication Rates

The Town of Grimsby requests that any changes made to the parkland dedication controls in the Planning Act through the proposed Bill 108 and its associated regulations retain a municipality's ability to recoup parkland at a rate similar to the current alternative rate of one hectare per 300 dwelling units.

It is the opinion of the Town of Grimsby that the parkland dedication rates in subsection 41 (1) of the Planning Act are insufficient for the Town of Grimsby's future needs. The Town of Grimsby has very limited greenfield lands remaining within its urban growth boundary, and therefore will likely no longer experience the large-scale subdivision-based development the rates in this subsection of the Planning Act were designed for.

Removing the ability of the Town of Grimsby to obtain parkland at a rate similar to the alternative rate of one hectare per 300 dwelling units will drastically limit the amount of public parkland that would be obtainable to support higher-density, infill developments, most of which arguably require more public parkland than their lower-density counterparts given how little

private amenity space they typically provide their residents. Public greenspace is essential to creating a healthy, vibrant and livable community, and therefore it is the opinion of the Town of Grimsby that the ability of a municipality to recoup parkland at a rate similar to the current alternative rate of one hectare per 300 dwelling units must be retained.

Council Resolution

On May 21, 2019, Town of Grimsby Council passed the following resolution:

WHEREAS the legislation that abolished the OMB and replaced it with LPAT received unanimous – all party support; and,

WHEREAS All parties recognized that local governments should have the authority to uphold their provincially approved Official Plans; to uphold their community driven planning; and,

WHEREAS Bill 108 will once again allow an unelected, unaccountable body make decisions on how our communities evolve and grow; and,

WHEREAS On August 21, 2018 Minister Clark once again signed the MOU with the Association of Municipalities of Ontario and entered into "...a legally binding agreement recognizing Ontario Municipalities as a mature, accountable order of government."; and,

WHEREAS This MOU is "enshrined in law as part of the Municipal Act". And recognizes that as "...public policy issues are complex and thus require coordinated responses...the Province endorses the principle of regular consultation between Ontario and municipalities in relation to matters of mutual interest"; and,

WHEREAS By signing this agreement, the Province made "...a commitment to cooperating with its municipal governments in considering new legislation or regulations that will have a municipal impact"; and,

WHEREAS Bill 108 will impact 15 different Acts - Cannabis Control Act, 2017, Conservation Authorities Act, Development Charges Act, Education Act, Endangered Species Act, 2007, Environmental Assessment Act, Environmental Protection Act, Labour Relations Act, 1995, Local Planning Appeal Tribunal Act, 2017, Municipal Act, 2001, Occupational Health and Safety Act, Ontario Heritage Act, Ontario Water Resources Act, Planning Act, Workplace Safety and Insurance Act, 1997.

Now therefore be it hereby resolved that Town of Grimsby oppose Bill 108 which in its current state will have negative consequences on community building and proper planning; and,

Be it further resolved that Town of Grimsby call upon the Government of Ontario to halt the legislative advancement of Bill 108 to enable fulsome consultation with Municipalities to ensure that its objectives for sound decision making for housing growth that meets local needs will be reasonably achieved; and;


Be it further resolved that a copy of this Motion be sent to the Honourable Doug Ford, Premier of Ontario, The Honourable Christine Elliott, Deputy Premier, the Honourable

Steve Clark, Minister of Municipal Affairs, the Honourable Andrea Horwath, Leader of the New Democratic Party, and all MPPs in the Province of Ontario; and,
Be It Further Resolved That a copy of this Motion be sent to the Association of Municipalities of Ontario (AMO) and all Ontario municipalities for their consideration.

Conclusion

The Town appreciates the opportunity to provide these comments. Please contact myself if you have questions or require additional information.

Respectfully submitted:



Walter Basic
Acting Director of Planning
Town of Grimsby

/as