



Town of Saugeen Shores

600 Tomlinson Drive, P.O. Box 820

Port Elgin, ON N0H 2C0

May 31, 2019

Planning Act Review
Provincial Planning Policy Branch
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John Ballantine, Manager
Municipal Finance Policy Branch
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13th Floor, 777 Bay St.
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via: Environmental Registry of Ontario

**Re: ERO 019-0016 and 019-0017
Bill 108 – Proposed More Homes, More Choice Act**

Thank you for the opportunity to provide comments on Bill 108 through the Environmental Registry. Saugeen Shores Planning Committee discussed these comments at a recent meeting.

Earlier this year the Province received our comments on increasing Ontario's Housing Supply. We have attached our previous comments for your information.

Generally, it is the Town's that many of the changes are designed to address impacts in the Greater Toronto Area, but that the impacts from those changes will be felt throughout Ontario, in both large and small communities.

From our perspective, Bill 108 would not stimulate the construction of new housing. The actual impacts may be savings to builders and developers at the expense of desirable community services (such as parkland). We do not see the ties to ensure supply is increased or housing prices lowered to be more affordable.

If the goal is to provide more housing at more affordable prices, changes to the Planning and Development Charges regimes that have a greater impact are outlined in our comments from January of this year (as attached).

Planning Act

As outlined, the proposed changes would potentially affect how and how much municipalities identify and supply parkland to serve communities. The concern from the Town's perspective is that the ability to acquire parkland in an amount sufficient to meet the needs of the community may be restricted or capped. This is particularly impactful because higher density developments, which predictably house more people and, therefore, may demand more parkland services, may be limited to an amount of parkland less than permitted currently. The Town supports looking at means to comprehensively address community needs, but stresses that municipalities' abilities to determine and fund parkland needs are best left for municipalities to determine without interference.

There is also an apparent higher level of administration required which could be costly, and which appears not to be eligible for compensation except through direct property taxation. The need to manage appraisers, coordination of multiple appraisals throughout a community, cost for appraisal, additional auditing, etc. adds to problems which take away from the goal of building communities which serve their residents. We do not support processes which create non-value-added work. This increases the cost of development applications which would be seen in the increase of fees, thereby not saving money on these applications and potentially affecting all development applications.

Moreover, the need to prepare a community benefits strategy is not defined and may result in additional studies and costs. This issue may be mitigated if the regulations stipulate how the strategy is to be prepared or if it can be coupled with the Development Charges review process or some other requirement already more-or-less in place. More information is needed on how this change would be better than the existing act provisions.

Development Charges Act

Waste Diversion targets are set by separate legislation and there is already work towards the implementation of such programs. Small municipalities are the least affected, but it is encouraging to see a financing source to expand services. Development Charges, however, does not allow for new programs, and for these types of programs, that need to be reviewed and incorporated.

Secondary dwelling units still put pressure on municipalities to provide services. If all secondary units are to be exempt from DC's, municipalities are left to fund shortfalls in infrastructure funding. We recommend the existing provisions remain and allow municipalities to determine how best to facilitate and charge for services for secondary dwelling units.

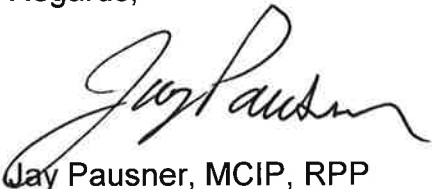
We agree that Development Charges may have a more tangible effect on the creation and construction of rental housing and industrial development. However, municipalities should be able to identify and create systems to incentivize the types of developments that meet local needs. By allowing installments, municipalities have to cash flow through other means, potentially. By having to administer and track payments, municipalities have to devote resources to doing so taking away from other services. The Province should review their programs to include financing opportunities to support cash flow in municipalities who participate in these programs.

Local Planning Appeal Tribunal Act

Generally, the proposed mean a return to the old OMB style of hearings. These changes take away a municipality's local autonomy and potentially allow developers to seek an over-ride to local decisions which are the result of local discussion and deliberation. A return to this system also may allow developers to withhold evidence or generate new evidence that was not available to local municipalities.

We look forward to further dialogue with whomever appropriate, so we can expand upon these thoughts and provide a more detailed plan to address housing supply.

Regards,

A handwritten signature in black ink, appearing to read "Jay Pausner". The signature is fluid and cursive, with a long horizontal stroke at the end.

Jay Pausner, MCIP, RPP
Supervisor, Development Services

Encl.

cc: Lisa Thompson, MPP



Town of Saugeen Shores

600 Tomlinson Drive, P.O. Box 820
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January 24, 2019

Director, Market Housing Branch
Ministry of Municipal Affairs and Housing
777 Bay Street, 14th Floor
Toronto, Ontario M5G 2E5

via: housingsupply@ontario.ca

To whom it may concern:

Re: Increasing Housing Supply in Ontario

Thank you for the opportunity to contribute to the development of Ontario's Housing Supply Action Plan. Saugeen Shores Planning Committee discussed these comments at a recent meeting. I am forwarding you our considered thoughts on how Ontario can assist municipalities to address housing supply.

Housing costs have risen dramatically in Saugeen Shores over the past few years. It is believed to have happened for the following reasons:

- High average annual income;
- Higher than expected growth;
- Demolition of other forms of temporary housing, such as cottage parks;
- Inability to build housing fast enough.

There are many other places in Ontario where housing is not affordable or not available at all.

We welcome the opportunity for us to highlight the struggles we face related to housing and provide comments and suggestions on how the Province can support us, and all municipalities, to address the existing, expected and emergent issues. We also welcome the opportunity to emphasize how addressing housing supply is a multifaceted issue requiring responses to transportation issues, job creation and job quality issues, among many other social and economic issues. For our purpose we will only focus on the direct housing issues identified for commenting by the Province.

We provide comments on the following subjects as outlined in the consultation document:

1. Speed at which projects get approved;
2. Getting the right mix of housing to meet demand;
3. Development costs are too high because of land prices and fees;
4. It's too hard to be a landlord and tenants cannot find suitable housing;
5. Innovation to address issue.

1. Speed

From the time a housing project is conceived to when a house is occupied can take years. While the process in Saugeen Shores is relatively quick compared to processes elsewhere, the time it takes to get a housing project off the ground is substantial. Improving the development process is also part of our #1 Strategic Priority: to facilitate appropriate growth in our communities.

Our developers are generally supportive of the Town's process and our progress to date to make our process smarter, more purposeful. They identify other approval agencies that have more time consuming process requirements than ours, often redundant with our process. We also know that requirements and approvals vary widely across the Province.

For instance, MOECP allows municipalities to process wastewater and stormwater approvals on their own, once the Ministry provides the original system wide approval. Once transferred, developers will only need a single approval, from municipalities, to begin installation of wastewater systems which would reduce time to construction by a minimum of six (6) months. However, many municipalities do not have adequate resources to facilitate the transfer in a timely way. Municipalities could be provided with funding to assist in the review of wastewater and stormwater systems to ensure a timelier transfer of approvals.

Rather than the speed of the process, the development process should be smarter. Better alignment of planning, infrastructure and financing will make the approvals process better.

We recommend that the Province:

- Reinforce the municipality's ability to delegate authority to approve housing projects which meet the needs of the community;
- Except in exceptional circumstance, prohibit appeals for housing projects which meet pre-approved local policy aimed at meeting provincial and local housing targets;
- Engage with Town staff and have further dialogue so we can discuss how our approvals process is supportive of housing development;
- Support municipal initiatives that are aimed at aligning planning, infrastructure and financing;
- Seek ways to streamline the infrastructure approvals process to ensure the timely installation of infrastructure to support housing and development;
- Provide funding to municipalities to facilitate the transfer of MOE approvals.

2. Mix

For many years, our market created housing limited in form to single detached dwellings. Some progress has been made in recent years in establishing a broader range of options. However, satisfying a large part of the housing market isn't the same as satisfying the whole of the housing market. Continued effort is required to ensure more rental and ownership housing options are provided and that, even for single detached dwellings, greater options in size and form are provided.

Municipalities continue to face negative opinion from the public for infill projects that attempt to introduce new forms of housing. Making sure good municipal policy can be implemented without costly or time consuming appeals is another strong method to ensure housing projects can be approved.

Current inclusionary zoning regulations prohibit municipalities from seeking cash-in-lieu of affordable housing. Often, developers do not have the means to integrate affordable housing in their own projects, so having an option to facilitate affordable housing construction elsewhere in a community makes sense.

We recommend that the Province:

- Reinforce the municipality's ability to create and implement policy to identify and address local housing needs to ensure housing construction conforms to local policy;
- Allow municipalities to collect cash-in-lieu of inclusionary zoning for all development sizes to ensure municipalities are in a position to support a range of affordable housing options throughout a community;
- Prioritize integrated asset management to ensure investments are made at the appropriate time to support an appropriate range and mix of housing developments that satisfy growth demands;
- Except in exceptional circumstance, prohibit appeals for housing projects which meet pre-approved local policy aimed at meeting provincial and local housing targets;

3. Cost

The provincial discussion paper indicates high land prices and government-imposed fees and charges as the causes of high housing costs. For municipalities, the cost to install growth-related infrastructure to support development is high. Development charges, specifically, were identified as a factor in driving housing costs up. This is a concern for the Town as the cost to design and install new growth-related infrastructure generally rests with the Town and there are limited options, in a fiscally responsible way, to recover those costs. Allowing municipalities to use development charges is critical to our success in all municipal governance areas, including municipalities' rights to reduce or eliminate these charges on their own terms.

Development charges should also be re-examined for school boards as there are a number of boards where growth varies significantly across the board but the current development charge regime doesn't account for these variations.

To install new greenfield infrastructure or replace infill infrastructure (to address intensification) shouldn't be put to municipalities as a mutually exclusive proposition. Municipalities need flexibility to address the pressures of new development. Therefore, maintaining municipalities' flexibility to address infrastructure financing should be left a municipal decision.

Other, more national or global economic pressures seem more responsible for overall housing costs. The Province is in a better position, due to its size and constitutional authority, to directly and indirectly influence these pressures.

Having the Province proactively work with major financial institutions to facilitate the implementation of good public policy may bear success in the long term.

Giving municipalities the tools to do better asset management will ensure new housing can be serviced at the right time, in a fiscally responsible way. For example, if the Province came out with a guideline on how to do road condition assessments, then all small municipalities could do it that way instead of reinventing the wheel in each place. This is similar to the water and wastewater design guidelines that we all follow, or Ontario Provincial Standards (OPS) for construction. Could the province set a standard requirement for number of municipal employees for kilometres of road or population?

We recommend that the Province:

- Consider reinvesting in infrastructure development, renewal, replacement and rehabilitation;
- Directly engage financial institutions to plan for investments that address socially beneficial goals, like affordable housing;
- Underline the importance of maintaining financial flexibility and ensure municipalities can flexibly apply the appropriate tools to address housing demands (such as infrastructure support, etc.);
- Reward municipalities that, using integrated asset management planning, responsibly invest in infrastructure renewal and investment;
- Re-examine Development Charges for school boards to ensure variations in growth within boards are recognized;
- Examine the potential reduce or eliminate redundancies in review and approvals;
- Recognize that Provincial funding programs are difficult to navigate in terms of application as well as reporting. A simple framework for specialized projects should be implemented or more formula based funding for municipalities instead. For example the CWWF funding, multiple spreadsheets for reporting throughout the year to receive the funds, which are confusing and repeat information throughout the documents being completed by every municipality that received the funds takes a significant amount of staff time.

4. Rent

Access to provincial funding is so complicated that it often requires specialized consultant advice to navigate approvals. Developers simply do not have the patience or dollars to spend trying to get approvals. Provincial requirements can be greatly reduced by ensuring local municipalities have appropriate housing policy in place and then channeling funding to municipalities without cumbersome documentation requirements or the need to hire consultants. Local municipalities are in a better position than the Province to establish and implement policy to reflect the needs and demands of the local housing market; the Province is in a better position to finance projects and can ensure municipalities have access to the resource.

We recommend that the Province:

- Allow municipalities to collect cash-in-lieu of inclusionary zoning for all development sizes to ensure municipalities are in a position to support a range of affordable housing options throughout a community;
- Establish guaranteed annual provincial funding for municipalities to implement their specialized and affordable housing policy.

5. Innovation

Saugeen Shores has enjoyed its most recent successful developments when there was a high degree of collaboration and partnership to meet shared goals. New approaches to addressing housing need are likely to be found when these collaborations are supported. Emergent solutions, unforeseen without partnership or collaboration, tend to lead to better solutions overall.

We recommend that the Province:

- Continue to actively promote collaboration and partnership between the various component players in the housing development system, including the Province, municipalities, developers, community groups and other housing advocates;
- Provide funds for initiatives for developments or community improvements that would be available to private entities with municipal partners.

I look forward to further dialogue with you, or whomever appropriate, so we can expand upon these thoughts and provide a more detailed plan to address housing supply.

Regards,



Jay Pausner, MCIP, RPP
Supervisor, Development Services

cc: Lisa Thompson, MPP