

April 27, 2022

Ministry of Municipal Affairs and Housing
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RE: Housing Needs in Rural and Northern Municipalities

The City of Temiskaming Shores is a small community in Northeastern Ontario located at the head of Lake Temiskaming, in proximity to the Quebec border. The City is made up of an urban component, being the former Town of New Liskeard, and the built-up areas of the former Town of Haileybury and Township of Dymond. The remainder of the City is made up of Provincially-designated prime agricultural land as well as rural lands.

The key barriers impacting our municipality in meeting the housing needs are as follows:

- 1) Requirement for Studies (Record of Site Condition, Environmental Site Assessments for Species at Risk, Noise Studies, D-Guideline studies, abandoned mine hazards) – while it is recognized that most of these studies are intended for the protection of public health and safety, developers tend to perceive any requirement for additional studies or information as a burden (red tape), due to either the cost of the work or the time to complete the work or both. Often the requirement for additional studies/information of this nature will stop a developer from moving forward with a project. The idea of a separate Provincial Policy Statement applying only to Northern Ontario has been proposed through previous PPS consultations, and exploring this possibility further may provide the flexibility needed to promote and support housing development in the north.
- 2) Cost of housing – the cost of housing in our municipality has increased exponentially since 2020. Prior to the pandemic, real estate prices in our municipality were stable and young families generally had very little trouble getting into the market. We have seen a huge influx of people moving to our area from southern Ontario driving up the price of homes in our municipality to the point where housing is unaffordable for local residents.
- 3) Lack of developers – There is one development company in our municipality that actively develops subdivisions. This company develops building lots only and the City has traditionally only issued between 2 and 5 permits for new homes per year. We are unsure how future subdivision development will move forward if this company decides to no longer pursue land development.
- 4) Lack of guidance from Provincial ministries – this comment ties in with #1. It has been noted that in recent years Provincial ministries have transitioned away from giving advice about specific situations and placed more of the burden on the individual property owner. For example, the Ministry of Natural Resources and Forestry used to provide a preliminary assessment of a property and determine whether or not an Environmental Site Assessment for Species at Risk would be required. Under the current government's guidance to the

Ministry of Environment, Conservation and Parks, the entire burden for determining requirements in this regard is on the property owner. As mentioned in #1 above, most potential projects do not move forward due to these types of requirements and the lack of information/guidance that is available from the Ministries. An additional example of this is with abandoned mine hazards. The current Ministry of Northern Development, Mines, Natural Resources and Forestry will only provide technical information from the Abandoned Mines Information System (AMIS) but will not review a proposed development to determine if there will be any concerns; instead the burden of this entire investigation lies with the property owner, which is often a make-or-break for developers as they are not going to see the same returns on their development as a property owner in the GTHA. This has had a negative impact in our municipality for a number of properties over the past few years. It would be helpful for developers and City staff if the Ministries were willing to provide some basic guidance and review of specific proposals in order to determine if additional investigation and studies are required

- 5) Lack of specialized government services in all locales – It has been noted that the smaller local offices of various Ministries are not as well-versed in various programs/incentives that may be available for development or for municipal projects, where larger offices in other regions of the Province are more familiar with the suite of Provincial government assistance. These services should be available in every locale, or at the very least the information should be available with the correct contact person. Using email and telephone, services offered in other parts of the Province should be made available to communities in Northern Ontario.
- 6) Lack of qualified professionals – land development requires the services of Professional Planners, Engineers, Ontario Land Surveyors, and the additional studies/information that may be required to support a development application can require many other specialized professionals. Our municipality is fortunate to have a local engineering firm, surveying firm, and an archaeologist, but many of the other specialized professionals are located in other municipalities. Due to the distances between communities in Northern Ontario, the costs associated with travel for these professionals to complete the work necessary to support development applications can significantly increase the cost of the project, which then either makes the project not financially feasible so it doesn't move forward, or the increased costs are passed on to the consumer making the final product cost prohibitive to the majority of residents and prospective residents.
- 7) Lack of skilled labourers – It is recognized that this issue is not unique to Northern Ontario, however the situation should be considered through the Northern Ontario context. There are many mining operations in relatively close proximity to our municipality, and many of the skilled labourers and tradespeople are able to earn a much higher wage working at one of the mines than they are by performing the same work within the municipality. Because of this, mining operations draw many skilled labourers away from the local workforce, exacerbating local labour shortages.
- 8) Lack of settlement services for immigrants – while immigration is increasing across the country, our municipality has not had much luck retaining those immigrants that do decide to come to the community. Our area lacks the services that immigrants need in order to settle in and become a part of our community for the long-term.
- 9) Development in unincorporated (unorganized) areas – Northern Ontario is made up of many unincorporated (unorganized) townships, and there is a great deal of interest and perceived benefit to people to develop in these areas: property taxes are extremely low, there is no

requirement to obtain a building permit for any construction, there are no Official Plans or Zoning By-laws to follow, and the land parcels are generally quite large. While the services have generally been limited in the unincorporated areas, the residents of these areas still use municipal roadways and infrastructure in their day-to-day lives, with no tax revenue being collected by the City to offset the costs associated with usage. Additionally, groups interested in a more collaborative/communal way of living, such as that proposed by the Boreal Forest Medieval Villages group, have set their sights on these unincorporated areas for much larger developments that are not subject to the same protectionist provisions as developments within municipal boundaries. Municipalities must implement and uphold policies that are consistent with the Provincial Policy Statement, however development is happening on land that is governed directly by the Provincial government and the developers are not being held accountable for, nor being subject to the same requirements as those developing within municipalities, which often share direct borders with these unincorporated townships. Policies to address this issue could include the collection of a fair tax rate with potential transfer to municipalities to offset the related infrastructure costs, the requirement for building permits in unincorporated areas, and greater oversight in general by the Province in these areas.

I have attempted to include suggested policies or changes in practice that could be considered in order to support development in the community within the information presented above. Thank you for the opportunity to provide feedback on this important issue.

Best Regards,

A handwritten signature in blue ink that reads "Jennifer Pye". The signature is written in a cursive, flowing style.

Jennifer Pye, MCIP, RPP
Planner