

APPENDIX A

TOWNSHIP OF SPRINGWATER STAFF COMMENTS

Proposed Planning Act and Development Charges Act Changes: Providing Greater Cost Certainty for Municipal Development-related Charges (ERO:019-6172)		
THEME	PROPOSED CHANGE	TOWNSHIP STAFF COMMENTS
<p>Planning Approvals removed from Upper Tiers</p>	<ul style="list-style-type: none"> - County of Simcoe would be considered as an upper-tier municipality <u>without planning responsibilities.</u> - Local municipalities would be the approval authority for all decisions except for Official Plans which would be subject to Ministerial Approval. 	<p><u>Township Staff Comments</u></p> <p>The Township would be required to fully process applications for Official Plan Amendments.</p> <p>It is unclear how this change will streamline/expedite approvals as reviews of Official Plan Amendments will still be required?</p> <p>Staff provide the following questions:</p> <p>Is the Ministry equipped with the resources necessary to process Official Plan Amendments in a timely manner?</p> <p>Will the proposed change to remove the approval authority from the County expedite approvals or will it represent delays as Official Plan Amendments from across the Province will require Ministry review?</p> <p>Clarification regarding the extent of the approval authority being delegated to municipalities is required.</p>
<p>Site Plan Approval</p>	<ul style="list-style-type: none"> - Exempt developments of 10 residential units or less and exterior design of 	<p><u>Township Staff Comments</u></p> <p>Exempting developments of 10 residential units or less would remove the ability to properly design residential development from an</p>

	<p>buildings from site plan control.</p>	<p>engineering perspective and remove the ability to require securities to ensure that infrastructure is constructed to Township standards.</p> <p>Site Plan considerations such as servicing capacity, traffic, landscaping, amenity space are all important considerations that are needed to ensure that development is well-planned.</p>
<p>Park Land Dedication</p>	<ul style="list-style-type: none"> - 5% conveyance rate only applies to portion of development that does not include affordable and attainable residential units. - Waive parkland conveyance requirements for affordable and attainable housing. - Alternative rate of 1 hectare per 300 dwelling units to 1 hectare per 600 dwelling units. - Landowners provided right to appeal parkland conveyance process and municipal decisions. 	<p><u>Township Staff Comments</u></p> <p>Provision for parkland may not be proportionate to higher densities as the need for open space areas tends to increase within areas that consist of smaller lots and increased residential densities.</p> <p>The proposed change requires a Parks Plan prior to the passing of a parkland dedication by-law, which will have a financial impact on the Township.</p> <p>Additional appeal rights for parkland dedication By-laws may represent an obstacle to the Province's objective to expedite the construction of homes as appeals to the Ontario Land Tribunal (OLT) would delay approvals for development and ultimately slow down house construction.</p> <p>Staff are concerned that the impact of the proposed changes would result in additional public funds spent to resolve park related appeals/disputes at the OLT potentially resulting in underserved communities from a parks and recreation perspective.</p>

<p>Draft Plan of Subdivision (Public Meeting Requirement)</p>	<ul style="list-style-type: none"> - Requirement for Public Meetings associated with subdivision applications removed. - Land lease communities added to subdivision control 	<p><u>Township Staff Comments</u></p> <p>Public meetings for plan of subdivision applications would not be required and would be at the discretion of Council.</p> <p>Public meetings for plan of subdivision applications would not be required and would be at the discretion of Council.</p> <p>This change could place pressure on Council by the development community to waive the need for a public meeting; conversely residents would request public meetings for plan of subdivision applications.</p> <p>The proposed change is not consistent with the approach taken for Planning Act applications such as Official Plan Amendments, Zoning By-law Amendments, consents/minor variances and would essentially remove public participation from the subdivision process, which is not conducive to identifying community/neighbourhood considerations.</p>
<p>Development Charges</p>	<ul style="list-style-type: none"> - Proposes to freeze, reduce and exempt fees for building attainable/affordable and non-profit housing. - Attainable/Affordable, non-profit housing along with additional residential housing exempt from development charges. - Development Charges for development related 	<p><u>Township Staff Comments</u></p> <p>Exemptions from fees/development charges associated with additional residential units/attainable/affordable/non-profit housing projects will result in a reduction in Township revenues for the provision of services that will inadvertently be absorbed by the taxpayer.</p> <p>Projects that are funded through development charges would be subject to a shortfall in revenues and the gap in funding would need</p>

	<p>studies cannot be funded through development charges.</p>	<p>to be recovered through alternative funding streams.</p> <p>Studies such as Master Servicing Plans, Development Charge Background Studies, Growth Management Studies that are needed to facilitate growth/development would need to be absorbed by the tax base, which is not consistent with the concept of development pays for development.</p> <p>Examples of significant Township of Springwater projects needed to support growth include the proposed Craig Road connection or the highly anticipated Multi-purpose Complex, which rely entirely or partially on development charges (Craig Road-100% development charge funded, Multi-purpose Complex-61% development charge funded).</p> <p>The Township could face a potential loss in Development Charge Revenues of \$8.3 million (land costs, studies, non-profit housing and mandatory phase-in gapping for Development Charge funded projects) needed for the Craig Road extension and multi-purpose complex. Therefore, a tax increase of 10% for each year over the next 5 years would be required.</p> <p>The tax increase noted above does not consider the replacement value for existing infrastructure of over \$985M.</p> <p>Should the additional property tax increase not be supported over the next five years then the timing of when projects move forward will</p>
--	--	---

		need to be reconsidered and in some cases be deferred.
Ontario Land Tribunal Act	<ul style="list-style-type: none"> - Increased powers to award costs to unsuccessful party. - Powers to dismiss appeals for unnecessary delay - Elimination of third-party (residents, rate payer groups) appeals. 	<p><u>Township Staff Comments</u></p> <p>Changes to the Ontario Land Tribunal Act appear to be intended to reduce appeals at the Ontario Land Tribunal by limiting appeal rights to applicants, the province, and public bodies and a potential deterrent through the prospect of awarding costs to the losing party.</p> <p>Staff are not supportive of these changes as the removing rights to appeal do not appear to be based on legitimate planning considerations.</p>

**Proposed Changes to Ontario Regulation 299/19: Additional Residential Units
(ERO:019-6197)**

THEME	PROPOSED CHANGE	IMPACT TO MUNICIPALITY
<p>Additional Residential Units</p>	<ul style="list-style-type: none"> - Would permit up to three residential units on a parcel of urban residential land (within a settlement area that is fully serviced) - Two residential units within a principal building and one ancillary building. - Three residential units in a principal building provided there is not a residential unit in an ancillary building. - Municipalities cannot require more than one parking space per residential unit. - Municipalities cannot require development charges, parkland dedication or cash in-lieu on additional units. 	<p><u>Township Staff Comments</u></p> <p>Core Infrastructure Upgrades/Provision of Parkland</p> <p>In order to increase the housing supply the Province is proposing additional permissions for additional residential units and further development charge exemptions as follows:</p> <ul style="list-style-type: none"> - Up to three (3) residential units on a lot with municipal services (3 units in primary building or 2 units in primary building and 1 unit in an ancillary building) - Exemptions from development charges, parkland dedication/cash in-lieu - 1 parking space for each unit is required <p>Staff agree that alternative options are needed to provide for a variety of housing types and that Additional Residential Units are useful to provide for a more affordable housing option.</p> <p>The ability for municipalities to provide and pay for infrastructure improvements, parks/recreation and maintain infrastructure to support growth, needs to be considered prior to</p>

		<p>the enactment of wide-spread policy changes.</p> <p><i>Core Infrastructure Upgrades</i></p> <p>The Township of Springwater currently owns and operates 9 water plants and 4 municipal sanitary sewer systems, with one additional water and sanitary sewer system to be added in the very near future. Each system has set capacity limits arrived at through various approval processes regarding the number of households that can be serviced. Staff expect that expansions/enhancements will be required to core infrastructure to support additional population growth.</p> <p>Exemptions to development charges for additional residential units are expected to create a further funding gap to pay for required enhancements to core infrastructure. Upgrades to existing infrastructure to support growth will have a significant financial impact on the municipality. The Township utilizes approximately \$118,000 worth of road, water, wastewater, bridges, and stormwater assets per existing home to provide services to each household. The net result of Bill 23 would shift the investment burden from the exempt development (Additional Residential Units) to the existing residents and the other non-exempt new development.</p>
--	--	---

		Without development charges, the Township would be forced to either borrow funds and rely on the taxpayer to fund expansions to municipal water and sanitary services needed to support additional growth.

Review of A Place to Grow and Provincial Policy Statement (ERO:019-6177)		
THEME	PROPOSED CHANGE	TOWNSHIP STAFF COMMENTS
Consolidation of Provincial Policy Statement and A Place to Grow	<ul style="list-style-type: none"> - Proposing to consolidate the Provincial Policy Statement and Growth Plan into one policy document. - Province is seeking input to obtain information oriented to the provision of additional housing. <p>(Tools for attainable housing mix, residential land supply, growth management, land use polices to increase housing supply etc).</p>	<p><u>Township Staff Comments</u></p> <p>The Province is canvassing municipalities regarding the consolidation of the Provincial Policy Statement and the Growth Plan seeking comments on potential policy changes that may assist in increasing the housing supply.</p> <p>Township planning staff comments will be forthcoming on this matter at a later date (December 7, 2022) as this is an ongoing review being conducted by the Province. The deadline for comments is December 30, 2022.</p>

Legislative and regulatory proposals affecting conservation authorities to support the Housing Supply Action Plan 3.0 (ERO:019-6141)

Proposed updates to the regulation of development for the protection of people and property from natural hazards in Ontario (ERO:019-2927)

Proposed updates to the Ontario Wetland Evaluation System (ERO:019-6160)

Conserving Ontario's Natural Heritage (ERO:019-6161)

THEME	PROPOSED CHANGE	TOWNSHIP STAFF COMMENTS
<p>Planning Applications</p>	<ul style="list-style-type: none"> - Conservation Authorities would not be permitted to review or comment on development applications 	<p><u>Township Staff Comments</u></p> <p>The Township and area municipalities will be required to pursue environmental expertise either by recruiting in-house staff or private consulting firms to conduct environmental reviews.</p> <p>While there may be some efficiencies related to this framework, availability of qualified experts to conduct reviews in a timely fashion without conflict of interest will need to be explored.</p> <p>There could be a financial implication depending on the framework that municipalities deploy.</p>
<p>Conservation Authority Act</p>	<ul style="list-style-type: none"> - Exemptions from permits under the Conservation Authorities Act subject to approvals granted under the Planning Act 	<p><u>Township Staff Comments</u></p> <p>The proposed change may result in a more efficient process provided that reviews conducted under the Planning Act include hazard lands considerations as part of the planning approval.</p>
<p>Wetland Evaluation</p>	<ul style="list-style-type: none"> - Province will not be involved in Ontario 	<p><u>Township Staff Comments</u></p>

	<p>Wetland Evaluation System Updates</p> <ul style="list-style-type: none"> - Proposes to establish guidelines to evaluate wetlands on an individual basis as opposed to a 'wetland complex' approach - Criteria utilized to determine the significance of wetlands are being removed which relate to habitat of endangered and threatened species 	<p>The protection of wetland systems is an essential environmental directive to maintain bio-diversity and ecological sustainability regardless of the location (urban vs. Rural).</p> <p>The proposed changes to the evaluation process will have an impact on important ecological systems, specifically wetlands resulting in degradation and loss of habitat.</p> <p>It is unclear to staff how the proposed changes are related to increasing housing supply?</p> <p>Wetland features are typically not conducive to development from a site suitability or an affordability perspective.</p>

Proposed Amendment to O. Reg 232/18: Inclusionary Zoning (ERO:019-6173)

THEME	PROPOSED CHANGE	IMPACT TO MUNICIPALITY
Inclusionary Zoning	<ul style="list-style-type: none">- A maximum 25-year affordability period- Maximum affordable units capped at 5% of the total number of units- Lowest price/rent to be considered affordable set at 80% of the average resale price of ownership units or 80% of the average market rent	<p><u>Township Staff Comment</u></p> <p>The Township would be required to enter into 25 year agreement requiring that the unit be affordable for 25 years.</p> <p>This provision will have a direct impact on the Township as additional staffing will be required to administer/facility agreements.</p> <p>Similar to other development exemptions, there will be a gap in funding services needed to support development, which will need to be addressed through alternative funding streams.</p>