



The Corporation of the Municipality of Strathroy-Caradoc
52 Frank Street, Strathroy, ON N7G 2R4
Phone: 519-245-1105 • Fax: 519-245-6353
www.strathroy-caradoc.ca

November 23, 2022

To Whom it May Concern

Re: Bill 23, More Homes Built Faster Act – Planning Act Changes

On behalf of the Municipality of Strathroy-Caradoc, I thank you for the opportunity to provide input on the proposed More Homes Built Faster Act and related Provincial changes. This submission relates to the Planning Act Changes.

It is appreciated that the Province of Ontario has highlighted the pressing need for housing across the Province. Its goal of supporting the construction of 1.5 million home is 10 years is laudable and elements of Bill 23 will certainly help achieve this target. Our own Municipality certainly views housing as a pressing need and the lack of affordable housing options is affecting many facets of our community. We now have a visible homeless population, our housing and support service providers are overwhelmed, long term residents cannot age in our community, nor can young people afford to move back to their home community to raise a family. Our employers are challenged to retain and attract employees which ultimately impacts their ability to expand or locate within their community of choice.

Despite this, we have still experienced unprecedented growth of our population – 18% increase in housing over the last five years, which has only further led to a rise in local housing prices as our inventory fails to keep pace with demand.

We have been proactive in our response to the housing crisis from a planning perspective by undertaking a significant update to our Official Plan and by approving a Secondary Plan that greatly increases the 'as-a-right' housing options within all of our neighbourhood areas, in line with the Province's approach to gentle intensification. We are also undertaking a Municipal-led update to our zoning by-law to permit emergency shelters as-a-right in the 'Institutional' zone. We provide financial incentives for the construction of new affordable units and secondary suites within our Community Improvement Program. Finally, as a small rural municipality with a population less than 25,000 people, we have also taken it upon ourselves to enter into a partnership with the private sector to construct a three-storey apartment building containing affordable

housing units. We are clearly facing the housing crisis head on but worry that changes being introduced by Bill 23 will undermine the Municipality's ability to address the housing crisis in a healthy and fiscally sound manner. This is not the time to go backwards.

We note our support of comments provided by the Association of Municipalities Ontario (AMO), Hemson, Watson & Associates, and the Municipal Finance Officers Association of Ontario (MFOA) to the Standing Committee.

It is the intent of this letter to focus on those amendments that are anticipated to have a direct and immediate impact on the Municipality's ability to provide for more housing opportunities in the short and long term related to the proposed changes to the Planning Act:

Planning Act Changes

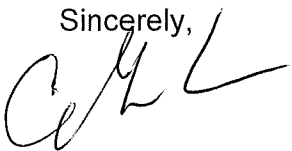
- While it is acknowledged that the OLT process may be used for vexations or frivolous purposes and can slow the development approval process down, the wholesale removal of 3rd party appeals may result in placing even more pressure on approval authorities and further erode confidence in local governance. Third party appeals provides, in some cases, a much needed opportunity to bring forward legitimate land use planning concerns.
- The municipality supports increasing density into new and existing neighbourhoods and currently allows secondary suites as-a-right in all residential zones within the Municipality. It has also introduced policies in the Official Plan to permit, in addition to secondary suites, additional residential units within accessory structures. As such, the Municipality supports the proposed gentle density provisions provided that local considerations are available to ensure that increased density does not have a negative impact on our local servicing capacity, greenspace, or road network.
- The proposed removal of public meetings for plans of subdivision is unnecessary in our opinion. While we work within a two-tier municipal governance structure, we have stream-lined the approval process such that a subdivision and related zone change application are subject to a single-combined public meeting before the local Municipal Council. This is possible as the County has delegated the role of holding the public meeting for the subdivision to the local Municipal Council. Accordingly, it is our opinion that removing the requirement for holding a public meeting for a subdivision will not speed the approval process up as there are already methods available within the Planning Act to planning authorities to stream-line this process.
- While the proposed removal of upper-tier responsibilities does not currently impact Strathroy-Caradoc at this time, we are aware of the intent to ultimately extend this approach to all two-tier governance structures in the future. While there may be some efficiencies found in delegating all planning approvals to local governments (where an Upper Tier does not manage cross-regional services

such as transit or servicing) we simply do not have the capacity to transition to a single-tier model without an extensive transition period. A single-tier approach to planning governance would have an impact on the need for additional staffing, physical assets, and space considerations.

- Removal of site plan approval for residential / mixed use developments containing 10 units or less may, in some cases, be reasonable – for example, street facing townhouses that were previously considered as part of a subdivision / condominium development. However, for new development that has not otherwise gone through a planning process, site plan matters such as storm water management / grading and landscaping are often integral to ensuring appropriate development occurs on the site. Further, a review of the exterior design is crucial to ensure new development is sensitive to the area context and is often fundamental to the creation of a new building that is welcoming and sensitive to the surrounding residential neighbourhood.
- Inclusionary zoning should be available to municipalities without protected major transit stations and development permit systems.
- Clarification is requested on the requirement for “spending” vs. “allocating” of parkland dedication on an annual basis. It would not be possible for a Municipality to create meaningful park spaces using annual contributions – it often takes 5 or more years to accumulate enough cash-in-lieu of parkland to purchase capital or land. Further, the Municipality should not be forced to accept parkland in a form that is not suitable for long-term use as active parkland. While there may be potential for encumbered land to be useful, Municipalities should be given the authority to accept or refuse such land if it is not able to be used in accordance with the parkland master plan.
- The proposed reduction of parkland dedication rates seem to undermine the ability to ensure adequate greenspace is available for the enjoyment of its residents from a mental health and physical fitness perspective. The pandemic has clearly demonstrated how important, desirable, and well used our greenspaces are.

In light of these comments, the Municipality respectfully requests that the Province consider extending the commenting deadlines into 2023 to allow for a more fulsome consultation on the proposed changes to avoid unanticipated negative impacts on the existing housing crisis locally and Province-wide.

Sincerely,



Mayor Colin Grantham
Municipality of Strathroy-Caradoc