



Township of Lucan Biddulph

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November 16, 2022

Ministry of Municipal Affairs & Housing
Office of the Minister
777 Bay Street, 17th Floor
Toronto, ON M7A 2J3

Attention: Minister Steve Clark

RE: Bill 23 – Impact on the Township of Lucan Biddulph

On behalf of the Council of the Township of Lucan Biddulph we would like to voice our concerns in regards to Bill 23.

Lucan Biddulph has been fortunate to experience healthy residential growth over the past five years. According to the 2021 Census numbers, Lucan Biddulph experienced a 20.8% increase in population between 2016 and 2021.

Lucan Biddulph is 75% of the way through the process to update our Development Charges. The current development charge for a single family home is just under \$7,000. We are facing an enormous increase in our development charge due to the fact that we require an expansion to our sewage treatment plant. It is estimated that the cost of constructing the expansion to the treatment plant will push our development charge for a single family home to an estimated \$25,000 or more. Bill 23 is proposing to limit any increases to the development charge to 80% of the proposed new charge in year one and increasing by 5% each year thereafter and reaching 100% by year five. If we estimate an average of 50 new residential units per year for each of the five years, it equates to a loss of some \$625,000. Who is going to pick up this cost? To put \$625,000 into perspective, that figure represents a 12.5% tax increase to our 2022 budget if spread across the entire municipality. Water and sewer users are required to cover their own costs so this shortfall must be made up by the roughly 53% of our residents that are on the water/sewer system.

We are trying to accommodate the push for residential growth in our area but the proposed changes in Bill 23 will hamper our ability to continue to grow, unless Council agrees to burden the existing ratepayers with these extra costs. The Municipality has, for the past 30yrs, explained to our ratepayers that with Development Charges, growth pays for growth. The contents of Bill 23 make it quite clear that this statement is no longer true. By phasing in any new Development

Charges, not allowing Municipalities to collect DCs from ARU (additional residential units), prohibiting/restricting Municipalities from collecting parkland dedication fees from certain types of developments and prohibiting Municipalities from using DC's to fund background growth studies, the Province is forcing Municipalities to push these costs to the general tax base. We feel this is the wrong approach. We understand the Province's goal to build 1.5m homes within 10 years and Lucan Biddulph feels that we are certainly doing our part. Approval of our updated Official Plan has been stalled at the County due to the Province putting a hold on the County of Middlesex's Official Plan. The process to update our Official Plan saw many requests from Developers to have land they own designated for residential purposes. We were limited to granting only a fraction of what was requested due to Provincial restrictions.

Bill 23's impact on our current sewer capacity is completely unknown. We do not know how many existing single-family dwelling owners will chose to expand their existing single-family home into two or three units. As of December 31st, 2021, we had a reserve capacity at the Lucan Sewage Treatment plant of 314 ERU (Equivalent Residential Units). If even 15% of existing single-family owners decide to take advantage of adding a single unit to their existing dwelling, we are basically out of sewage capacity at the existing sewage treatment plant. Not only would the capacity be used up, the Municipality wouldn't have been able to collect any DC's to cover the cost of the supplying that sanitary capacity. This is a serious issue for our small municipality.

We would also like to express our concern in regards to the Conservation Authorities being our partners in regards to commenting on environmental and storm water aspects of planning applications. The Conservation Authorities typically charge \$200 or \$250 per application to provide comments to Municipal Council in regards to various planning applications. If the Province bars municipalities from using Conservation Authorities for this service, smaller Municipalities, such as Lucan Biddulph, will have to retain the services of a consultant. The costs of such would need to be borne by the applicant. I do not believe any consultant would be able to provide comments on a planning application for \$200 or \$250. This results in higher costs for the same service. Would it not be better to give the decision of whether or not a Municipality uses a particular Conservation Authority to the Municipality?

We submit these comments to you in the hope of raising awareness of the potential impact of certain sections of the proposed Bill 23. We would be pleased to meet with you or your staff to review any of these comments in more detail.

Yours Truly



Ron Reymer
Chief Administrative Officer/Clerk

c. MPP Monte McNaughton