



November 22, 2022

The Honourable Steve Clark
Ministry of Municipal Affairs & Housing
17th Floor, 777 Bay Street
Toronto, Ontario
M7A 2J3

Dear Minister Clark:

Re: ERO Number 019-6172 - Proposed Planning Act and Development Charges Act, 1997 Changes: Providing Greater Cost Certainty for Municipal Development-related Charges

I wish to provide the following comments regarding ERO-019-6172 - Proposed Planning Act and Development Charges Act, 1997 Changes: Providing Greater Cost Certainty for Municipal Development-related Charges.

The Municipality of Lakeshore acknowledges and supports the province's stated objective of increasing housing supply. However, Lakeshore Administration are deeply concerned that if Bill 23 is passed as currently proposed, a variety of significant unintended consequences will have the opposite effect and will delay or obstruct the construction of additional housing supply at the scale that is desired.

Lakeshore is of the opinion that reducing the amount of parkland that Municipalities can collect will not contribute to healthy active communities and will ultimately place additional tax burden on the existing rate payers to cover the shortfall in parklands. Reducing the amount of parkland that can be collected for new developments/communities will also contribute to inequitable access to services and amenities across our Municipality.

Lakeshore Administration and I support the proposal to freeze parkland dedication rates at time of application for a period. This will provide incentives for some developers to proceed with their developments in a more expeditious fashion. With that being said, I would suggest that only a one year freeze be implemented.



Lakeshore Administration and I support the clarification that parkland should only be applied to new residential units, and not to existing developments.

We support in principle, entering into agreements to use private property for parkland purposes. With that being said, I recognize that this should not be used as a substitute for developers to provide parkland dedication. When Municipalities acquire fee simple property for parkland, they can sell the land in the future and reinvest those funds to acquire or develop other parklands. This would not be the case when it is a private park.

I do not support the proposal to require municipalities to spend at least 60% of their parkland dedication, although I do support the requirement to allocate it. I understand that municipalities collect these funds for the specific purpose of providing parkland and agree that these funds should be allocated to specific projects. My concern is that sometimes these specific projects can cost significantly more than a municipality can collect in a given year, which would either require the municipality to fund the shortfall from its tax base or proceed with small projects that can be completely funded by cash-in-lieu.

There is support in setting a maximum interest rate for Development Charges (DC) freeze and deferral at prime plus one percent (1%).

Lakeshore Administration and I do not support the proposed changes that would reduce the amount of (DC) that a municipality can collect and the phasing-in of Development Charge rates. Municipalities collect DC's to pay for infrastructure that is required to support growth. Without that ability to collect the appropriate funds, the municipality will not be able to accommodate new development. In my opinion this change will limit future development since municipalities will not be able to pay for required services to support new growth.

I encourage and support the diversification of housing options, particularly family-friendly rental housing as this form is missing in Lakeshore. As stated previously, I am concerned that the reduction of DC's, would have a negative impact on the municipality's ability to fund the infrastructure that would be required to support the development.



With regard to encouraging the supply of affordable housing through non-profit and affordable housing units, we do not support the reduction or the phasing in of Development Charges and Parkland dedication for the reasons mentioned above. Also, entering into agreements on title to be administered over several years places an administrative burden on the municipality which is funded by the general taxpayer. We would suggest that instead, innovative tools be used which is funded by the general taxpayer. We would suggest that instead, innovative tools be used to cover these costs at the time of construction. For example, these costs could be covered through a municipal Community Improvement Plan program or alternatively, the non-profit organization would cover these costs through fund raising.

Accessory Residential Units will require municipal infrastructure and will benefit from having parks in close proximity, as such they should not be exempt from contributing. I recommend that ARU's be required to pay DC's and parkland dedication at a reduced rate.

Thank you for the opportunity to submit comments regarding these proposed legislative changes. I look forward to reviewing the outcome of the consultation.

Sincerely,

Tracey M. Bailey,
Mayor

Cc: Tammie Ryal, Corporate Leader Growth & Sustainability
Truper McBride, Chief Administrative Officer
Aaron Hair, Division Leader Community Planning