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November 16, 2022

Hon. Steve Clark
Ministry of Municipal Affairs and Housing
777 Bay Street, 17th Floor
Toronto, ON M7A 2J3

Dear Minister Clark:

RE: Proposed Changes via Bill 23: More Homes Built Faster Act, 2022

The Town of Parry Sound appreciates the opportunity to provide input on the changes proposed through Bill 23. As a single tier municipality located well outside of the Greater Toronto Area, not all of the proposed changes will affect our municipality. That being said, some of the proposed changes will have a significant impact as well as the potential for unintended consequences.

Our comments are two-fold; we are concerned with our reduced ability to regulate certain developments through site plan control and we are concerned the proposed changes will shift costs onto the property tax payer and impact their ability to stay in their homes.

CONCERNS REGARDING CHANGES TO THE SITE PLAN APPROVALS

The Town of Parry Sound has three issues with the proposed changes to site plan approval as follows:

1. A reduced ability to implement architectural controls;
2. A reduced ability to require landscaping; and
3. The increase in the minimum size of development needed to implement site plan control impacts such issues as drainage.

Through the site plan control process, the municipality currently provides input into the design of buildings through architectural controls. These controls can help to enhance the sense of place and provide advantages from an economic development perspective. In the absence of architectural controls, the municipal voice is lost in negotiations for certain developments and would no longer be able to negotiate high quality design and hold a developer to consistent standards. **We recommend that the ability to regulate architectural controls via a site plan agreement not change.**

Further, landscape requirements are important in order to reduce offsite visual impacts. Developers in Parry Sound have been great partners in providing landscaping for proposed developments in order to mitigate neighbouring concerns by reducing visual impacts as well as providing aesthetically pleasing buffering between uses (in contrast to fencing requirements or costly berms). Lastly, landscape requirements allow the municipality to require native vegetation instead of non-native vegetation that may not be suitable in the local context or that could potentially be invasive. **We recommend that the ability of municipalities to regulate landscaping via a site plan agreement not change.**

Lastly, we have great concern with the minimum development size prior to requiring a site plan agreement. We would note that given the size of Parry Sound, a single or multiple 10-unit building proposal can have a substantial impact on the municipality. One of the most important tools that is utilized through site plan control is the ability to regulate stormwater management. A 10-unit development could potentially have a large development footprint along with parking areas and could result in a large imperviable area. Removing the ability for municipalities to require a site plan agreement for developments with large footprints creates holes in the Town's regulatory toolbox to deal with stormwater management effectively. **We recommend that the proposed bill be changed to include a minimum development area in addition to the number of units being exempted from site plan control.** This would have the added benefit of encouraging compact form while also setting appropriate limits for site plan exemptions.

FINANCIAL CONCERNS FROM THE MUNICIPALITY:

The Town has two main issues regarding the impact on municipal finances and taxation as follows:

1. A shift away from the principle that growth pays for growth; and
2. Placing the financial cost of social services, such as property tax relief for certain types of housing developments onto the remaining property tax payer.

The proposed changes to development charges and other legislation reduces a municipalities ability to collect the cost to service growth, from growth. The inability to collect growth related costs through development charges does not eliminate the need for the growth-related capital projects. The projects are still required to ensure services are in place to support growth and maintain levels of service. The reduced ability to collect development charges unfairly shifts the financial burden and economic risk from those that directly benefit from the growth-related capital infrastructure to the municipality and ultimately the property tax payer. In many small and medium size communities, development may be delayed if the increased financial burden to the municipality is too large relative to the size of the community. **We recommend that further review and consultation take place with municipalities prior to any changes to legislation impacting Development Charges, Community Benefits Charges, Parkland Dedication, etc.**

Bill 23 proposes providing property tax relief for certain types of housing developments; however it is unclear how the province intends to fund the property tax relief. The primary concern is that subsidized housing is a form of wealth redistribution and is more appropriately funded through other revenues such as income taxes and not through property taxation. Property taxes should be collected to fund property-based services.

We recommend that property tax relief for certain types of development only be pursued if it is managed and funded directly by the province and does not impact municipal property tax rates and the amount of property taxes collected from each property.

We appreciate the province's desire to streamline development processes, increase the housing supply in Ontario and the opportunity to provide comments.

Sincerely,



Clayton Harris
Chief Administrative Officer
Town of Parry Sound

C MPP Graydon Smith
Mayor Jamie McGarvey
Members of Council
Rebecca Johnson, Town Clerk