

December 6, 2022
Ministry of Municipal Affairs and Housing

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

Please accept this Written Submission with respect to the ERO 019-6172 posting.

I am writing as an individual and as a Registered Professional Planner in the Province of Ontario with over 30 years of professional practice in this province. I'm also writing as an individual who has spent the majority of my professional experience working for municipalities as a land use planner responsible for the review of development proposals and the development of greenland networks within neighbourhoods. Over the course of my career, I have facilitated the development of numerous parks, trails and open space systems and housing through subdivision approvals while attempting to safeguard nature and balance the competing interests of the public and developers. My deep experience of how our land use planning processes work as a manager and director provides me with a broad understanding of the mechanics across the Acts and spectrum of changes being proposed.

Parkland proposals

It is purported the proposed amendments will provide greater cost certainty of parkland costs and thus enable housing developments to proceed more quickly. This line of thinking is based on the belief that market forces will incent developers to act, and act quickly. However, there is no guarantee the savings will be passed along to the home buyers or that it will speed up the process. Indeed, this line of thinking would lead to major costs in the future when it is realized that to make them more livable retrofits will be necessary. Planners who have worked in urban areas laid out prior to the implementation of applicable parkland dedication standards know how difficult it is to retrofit these residential areas.

Parks are one of the major contributors to a neighbourhoods character and the quality of life of residents. There is a good deal of scientific evidence that parks and open spaces are the most cherished of "public goods". Giving the developer the option to determine what lands should be dedicated and requiring a municipality appeal to the Ontario Land Tribunal if they do not agree, puts "public goods" as a secondary consideration over private profitability. In addition, reducing standards for denser developments while exempting affordable and rental housing shifts the burden for supplying equitable service levels to the local taxpayer or risks the creation of ghettos.

Reduce development costs to enable more housing to be built faster and Set maximum interest rate for DC freeze and deferral

The proposed reductions and exemptions from development charges would shift the burden of the cost of growth from developers to taxpayers. They contradict the long-

standing principle that “growth is to pay for growth”. DCs are collected and put towards studies and infrastructure needed to support new development such as water, wastewater, sidewalks and roads. The impact of reduced service levels would be more acute for denser housing forms as the “public goods” which make up neighbourhoods would be starved of funding, and thus either not built or built to a lesser standard, this form of cost savings results in higher operational and maintenance costs, thus no real savings in the long-term.

Site Plan Control

The updates to Bill 23 that clarify elements relating to sustainable design and environmental standards are supportable. The removal of landscaping and the change in scope of where site plan control will apply (i.e. inclusionary zoning and as-of-right additional dwelling units) means basic issues such as parking and ensuring developments are designed with inherent resiliency to address changing weather patterns and conditions will not be reviewed.

Public Engagement

Public participation is an established cornerstone of local planning and decision making in the public interest. The recommended changes and the speed with which Bill 23 has been given Royal Assent do not and have not provided the public with the ability to understand and comment on the changes that will literally affect where they live, their neighbourhood and broader community.

The need to address affordability and increase housing options for Ontarians is well known. What is not known is whether the Provincial efforts to streamline and find efficiencies in processes will address housing supply and affordability. I along with many other urban planners are concerned that the changes will have significant adverse impacts on residents quality of life and municipalities fiscal ability to provide parks, services and infrastructure.

Sincerely,

A rectangular box containing a handwritten signature in cursive script that reads "Faye Langmaid".

Faye Langmaid, FCSLA, MCIP, RPP