

Introduction

The Township of Huron-Kinloss understands the importance of Bill 23 and commends the Province on taking unprecedented action to solve the housing crisis. While we support the overall intent of Bill 23 and a more active approach on housing development, we have some concerns that need addressed.

Our major concern with Bill 23 as written, is the blanket approach to the Province in all areas. Rural and urban Ontario are very different and Bill 23 fails to realize this. Generally speaking, rural Ontario is not ready to support Bill 23 as written because we don't have the infrastructure in place to support it. In Huron-Kinloss we do not have public transportation, a grocery store, a hospital, a high school; 1,000 of 7,000 residents do not have a family doctor, there are no walk-in clinics nearby and many of our emergency departments are closing. These concerns only scratch the surface when it comes to specific rural issues not recognized in Bill 23.

Furthermore, Huron-Kinloss would like the Province to re-consider including the word "attainable" in Bill 23 without a proper, clear definition of what attainable housing is. The definition of affordable housing is clear and easy to understand. Attainable housing should be just as clear or should be removed from all parts of the Bill.

We understand the importance of action to make a real difference in the housing crisis. We support the Province in trying to implement actionable solutions but we hope you will consider our comments on Bill 23 and show your support and understanding for rural Ontario.

Planning Act Changes

Additional Dwelling Units

Problems: The allowance of 3 residential units on a parcel of land without any approvals required at the Municipal level will impact our water and sewer capacity. Without the ability to charge Development Charges, we have no fiscally responsible opportunity to ensure increased capacity can be met (through construction of new or expanded water and sewer infrastructure). While well intentioned, this change will disproportionately affect rural Ontario where our capacities are already maxed out. Parking will also become an issue because we don't have public transportation, each unit will require at least one parking space. Finally, many rural communities, including Huron-Kinloss, share water and/or sewer infrastructure with neighbouring communities, additional units on any of these properties will negatively impact our neighbours water and sewer capacity as well.

Solution: Due to the capacity constraints and community infrastructure in rural Ontario, Huron-Kinloss is requesting that the Province add provisions to Bill 23 that will allow Municipalities outside of your target zones (Golden Horseshoe Area) to reject building permit applications for additional units if water and/or sewer capacity cannot support the additional dwelling units.

Site Plan Control

Problem: 10 unit developments are substantial for rural Ontario and will have major impacts on transportation (parking and traffic), snow removal, garbage removal and accessibility.

Solution: Huron-Kinloss requires site plan control for developments of 4 units or more, we are requesting the Province drop the number from 10 to 4 units for all areas outside your target zones (Golden Horseshoe Area).

Subdivisions

Huron-Kinloss agrees with the changes being proposed in Bill 23 regarding subdivision development; however, we would like to request that wording be included in the legislation that gives Municipalities the option to hold public meetings for subdivision developments. The Township of Huron-Kinloss is working hard to build transparency and trust with our residents and we should have the ability to inform our residents of any changes to their communities through public meetings or other forms of communication. Adding additional verbiage to the legislation will deter from any conflicts between the Municipality and Developer's if a public meeting is proposed – for communication purposes only.

Appeals

Problem: Huron-Kinloss supports the province's intention to end frivolous appeals to new developments; however, we are concerned that our Council will receive increased calls from residents requesting that the Municipality appeals development, bringing increased politics to planning.

Solution: We support the removal of third-party appeals but are concerned there will be unintended consequences. To avoid this, we are requesting the Province define exactly what a Municipality can appeal and how. And further, include additional safeguards to protect our Councillors from being used as tools for third parties to bypass the new legislation.

Parkland

Problem: Huron-Kinloss has three major issues with the Parkland changes proposed in Bill 23.

1. Access to parkland and greenspace should be seen as a basic need for all Ontarians. All residents deserve the quality of life we've come to cherish in our beautiful Province.
2. Protecting and enhancing parkland, greenspace and reforestation is a passive and easy opportunity for Ontario to support the fight against climate change.
3. Investing in parks and greenspace should be in accordance with the Municipalities Parks and Recreation Master Plans or Strategic Plans, not a mandatory spend as outlined by the Bill 23.

In Huron-Kinloss we have never received a complaint from Developer's about Parkland dedication or cash in lieu of parkland. We have a Parks and Recreation Master Plan, a Climate Change Action Plan and Growth and Servicing Master Plan. We have put a lot of work into developing ten to twenty five year plans that include capital upgrades and park development that would be greatly impeded by the requirement to spend 60% of our parkland dedication fund annually.

Furthermore, removing parkland requirements from affordable housing developments is especially irresponsible of the Province. Many of those in need of affordable housing should be given access to free, high quality parks and green space as a basic necessity, especially if they are likely unable to access paid recreation and leisure programming. Without parkland and greenspace, housing will be built in unliveable communities and that's not what we should be promoting in Ontario.

Finally, the exemption of parkland dedication for attainable housing developments needs to be better defined. We are very unclear as to what constitutes attainable housing developments. We do not believe any developments (attainable or affordable) should be exempt from parkland dedication because parkland should be considered a basic need for all residents of Ontario.

Solution: Please repeal Schedule 42 and 51 from Bill 23, the need for parks and green space is vital in maintaining the fabric of our communities and is a very small request from Developer's to ensure our residents can enjoy the quality of life we promise in Ontario. If you are unwilling to repeal schedule 42 and 51 please exempt communities outside the Golden Horseshoe Area so rural Ontario can continue to support their residents with high quality, free park space.

Ontario Land Tribunal

The Township of Huron-Kinloss supports the changes to the Ontario Land Tribunal as proposed in Bill 23.

Development Charges

Problem: Huron-Kinloss believes strongly that development should pay for development but understand the need to incentivize affordable housing developments for Developer's. There needs to be a balance between the Municipality and the Developer's, and what can be recuperated through development charges and what cannot.

Solution: Development Charges should be charged to Developer's to cover hard services but Developer's should be exempt from paying for soft services (ie. Housing Services) for affordable housing developments. Municipalities should have the power to determine when and how they charge development charges based on the type and need for certain developments in their municipalities.

Conservation Authority

Huron-Kinloss supports limiting the powers of Conservation Authorities to their core mandate; however, we are requesting the Province allow municipalities to consult Conservation Authorities on matters outside their core mandate if they can provide expertise not available at the Municipal level.

Wetlands

Huron-Kinloss would like more information on the changes proposed in Bill 23 regarding wetlands in order to provide accurate comment.

Conclusion

The Township of Huron-Kinloss appreciates the time and effort the Province and the Housing Task Force have put in to developing real solutions to the housing crisis in Ontario. We also appreciate the opportunity to provide our comments. If the Province takes anything from our comments, please reconsider enacting Bill 23 as sweeping legislation across the Province and work with your rural municipalities to develop a Bill that considers our unique challenges.

Huron-Kinloss wants to be a part of the solution. We want to include our voice, our resources and our commitment to solving the housing crisis. We want to work in collaboration with the Province to continue to build communities we all want to live in.