



December 8, 2022

Township of Cavan Monaghan
988 County Road 10
Millbrook, ON
L0A 1G0

Re: ERO Numbers: 019-6163, 019-6196 and 019-6172

To whom it may concern:

At the Regular Council Meeting of December 5, 2022, the Township of Cavan Monaghan Council received a Report regarding Bill 23, More Homes Built Faster Act, 2022. Council discussed this matter and passed the following motion:

That Council receive Report Planning 2022-51 Bill 23 – Update (the More Homes for Everyone Act, 2022) for information;

That Council direct Staff to provide an update and detailed analysis of the implementation matters (financial, human, operational) related to Bill 23 (including Bill 109); and

That Staff send a letter outlining Council's comments to the Environmental Registry of Ontario (ERO) as the Township's written submission regarding Bill 23 and its associated changes prior to the (amended) commenting deadline of December 9, 2022.

Consistent with the motion, Staff are providing the following comments on behalf of Township Council and submitting to the Environmental Registry of Ontario (ERO):

- The Township supports the principle that growth should pay for growth but changes made through Bill 23, specifically to Development Charges, will shift infrastructure costs associated with growth to be funded by existing ratepayers;
- The Township requests greater clarity from the Province as to the quantifiable improvement to housing affordability that the legislative changes in Bill 23 will be both measured and achieved by the proposed changes;
- The Township fully supports and recognizes the need to increase supply of both affordable and attainable housing but believe it is essential the Province provide clear definitions of both of these terms to their municipal partners;
- The Township requests the Province consider more fiscal incentives at the provincial level to facilitate the construction of more attainable and affordable units in rural municipalities;

- The Township is of the opinion that some of these changes will reduce municipal revenues resulting in the existing ratepayers funding costs of growth and infrastructure through increased taxes;
- The Township is not convinced that these measures will create the right market conditions, at the local level, that will meet the range of housing options the Cavan Monaghan community requires now and into the future;
- The Township does not have enough control over the process to ensure that developers submit applications, building permits or other planning approvals in a timely fashion;
- The Township recognizes the contributions of upper-tier municipalities and conservation authorities as part of the overall land use planning process and is of the opinion that some of these changes will negatively impact land use planning decisions;
- The Township believes that reducing the appeal rights for third parties will limit public participation and possibly deter neighbours from bringing concerns and impacts about development before decisions makers;
- The Township is concerned that rural municipalities do not have the Planning administration capacity to meet the proposed time constraints identified in the Bill; and
- The Township is of the opinion that these sweeping changes along with other recent legislated amendments (i.e., Bill 109) continue to introduce uncertainty in the local land use planning process while placing a burden on municipal resources (financial, human resources) already dealing with operational constraints.

Sincerely,

[ORIGINAL SIGNED BY]

John F. Connolly, RPP MCIP
Executive Director, Planning & Development
Township of Cavan Monaghan
Work: 705-932-9329
jconnolly@cavanmonaghan.net