



Severn Sound Environmental Association

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Submitted by email to:

Ministry of Municipal Affairs and Housing

777 Bay Street, 17th floor

Toronto, Ontario M7A 2J3

MFPB@ontario.ca

RE: Environmental Registry of Ontario Number ERO 019-6172
*Proposed Planning Act and Development Charges Act Changes: Providing
Greater Cost Certainty for Municipal Development-related Charges*

The Severn Sound Environmental Association (SSEA) wishes to take the opportunity to comment on the *Proposed Planning Act and Development Charges Act Changes: Providing Greater Cost Certainty for Municipal Development-related Charges*.

The Severn Sound watershed is in southeastern Georgian Bay. The SSEA is a Joint Municipal Service Board under the Municipal Act, and works closely with eight lower tier municipalities (Midland, Penetanguishene, Tay, Tiny, Springwater, Georgian Bay, Severn and Oro-Medonte) and two upper tier municipalities (County of Simcoe and District of Muskoka) in the Severn Sound area, as well as provincial and federal government agencies and non-government organizations. The SSEA's mission is ensuring exceptional environmental quality through exemplary stewardship of the Severn Sound area through sound science, collaboration and partnerships. The SSEA collects environmental data and provides expertise to member municipalities, works to keep water clean to support healthy terrestrial and aquatic ecosystems, and has been heavily involved in municipal drinking water source protection activities as the local Source Protection Authority in the Severn Sound area. As a service to our member municipalities, the SSEA plays a key role in identifying and documenting natural heritage features, including wetlands, for use in municipal Official Plan updates, and reviewing stormwater management plans and Environmental Impact Studies for new developments.

We offer the following comments and recommendations:

Parkland

1. We are concerned that the rate of parkland conveyed is proposed to be cut in half. There are many benefits of urban parkland, including:
 - providing permeable surface that help with managing stormwater, which is especially important in high density developments;
 - improving mental and physical wellbeing, particularly in high density developments where greenspace is lacking; and
 - if treed, providing shade for cooling during heat waves, which will become more frequent with climate change.**We recommend that this provision be removed.**

2. Putting a cap of either 10 or 15% on the amount of developable land that can be required for parks, depending on total development area, takes local decision making power away from municipalities. There may be cases where it's appropriate to designate more than 10 or 15% to parkland. **We recommend that this provision be removed.**

3. We do not agree with the proposed change that would exempt affordable housing developments from development charges and parkland dedication requirements. While we recognize the need for affordable and attainable housing, these developments still have infrastructure and parkland needs that must be paid for, and these developments need an appropriate amount of parkland just as much as any other. Given their benefits, parks should be seen as a necessary piece of infrastructure, just like a stormwater facility. **We recommend that this provision be removed.**

Development Charges

4. We are very concerned about the proposed changes that would reduce current development charges (DCs) and slow future increases, as well as use a historical service level of 15 years rather than the current 10 years to calculate capital costs that are eligible to be recovered through DCs. These charges are necessary to fund infrastructure costs associated with development, which will now be passed to the municipality and ultimately likely the taxpayers. **We recommend that these provisions be removed.**

5. We are particularly concerned by the proposed change that would no longer allow the required studies associated with developments to be covered by DCs. These would include hydrogeological studies, Environmental Impact Studies, and

other environmental and natural hazard assessments that are used to ensure the protection of sensitive habitats, Species at Risk, and human life and property from hazards like flooding. Studies identify natural hazards and are used to inform how developments are designed, including recommendations on habitat protection and stormwater mitigation. **We recommend that there should be a priority list of studies that can be recovered by DCs, i.e., those that pertain to human or environmental health and safety.**

6. Reducing the need to update development charge by-law from once every 5 to once every 10 years takes away the ability of municipalities to adapt to growth pressures as locally appropriate. **We recommend that this provision be removed.**
7. Regarding both parkland and DCs, the Province states that the proposed changes would help to provide cost savings for home builders, home buyers and renters, however this is assuming that developers will pass the cost saving on, which may not occur unless regulations mandate it.

Thank you for the opportunity to offer feedback on the *Proposed Planning Act and Development Charges Act Changes: Providing Greater Cost Certainty for Municipal Development-related Charges*. The eight member municipalities in the Severn Sound watershed look to the SSEA for guidance and support on many environmental aspects of municipal planning. The SSEA encourages the Province to reconsider the proposed changes to the Planning Act and Development Charges Act, 1997. The SSEA welcomes the opportunity to discuss our comments further. If you have any questions or comments please feel free to contact the SSEA office.

Sincerely,



Aisha Chiandet
Water Scientist

CC Julie Cayley, SSEA Executive Director