

PUBLIC STATEMENT – THAMES CENTRE – BILL 23

Thames Centre is a prosperous, growing community in the eastern sector of the County of Middlesex. Our Municipality includes two communities experiencing appreciable growth in residential and commercial developments. Like many rural Ontario partners, our community has experienced affordable and attainable housing shortages, increased development activity, and a sharp rise in housing costs in the last several years.

The Province's recent introduction of Bill 23 seems to address approval process problems in "larger centres" more than portions of rural Ontario like Thames Centre. Thames Centre, overall, already works well with the development community and issues timely planning and other development approvals. Thames Centre believes Bill 23 will only substitute a relatively efficient process with different processes, time, and development costs.

The Province conducted a very narrow, developer and real estate-focused consultation in developing its strategy to address the housing crisis. It is misleading to blame the easy target of municipalities in this regard. The Province should look at its approval processes, legislation, and responsiveness concerning matters related to the *Endangered Species Act*, Records of Site Conditions, archaeological assessments, and Environmental Compliance Approvals, if it would like to speed up Municipal approvals.

Many of the changes associated with Bill 23 will have consequential impacts on the land use planning process, such as removing some planning responsibilities from several upper-tier municipalities. Others are more targeted towards financial changes, such as the proposed creation of a new "affordable" and "attainable" housing program, neither of which has been officially defined by the Province.

The limiting factor in addressing the housing crisis is labour and material shortages caused by government policy and the demographics of an ageing population. The Province would better address the housing crisis by finding ways to increase the capacity of the building industry and direct that capacity towards forms of housing that produce more units (e.g., medium and high rather than low density). Placing these expectations on municipalities will only result in increased staffing needs and put more pressure to draw labour away from construction and manufacturing.

Conservation Authorities

Concerning Conservation Authorities, the Municipality of Thames Centre has an excellent working relationship with our two Conservation Authorities (Upper Thames River and Kettle Creek). They are responsive given the level of resources they have and provide valuable expertise, resources, and services to the Municipality. These duties would not be practical for a Municipality of our size to provide internally. The Municipality would appreciate the consideration of obtaining these services through memorandums of understanding. Municipalities will be reluctant to grant planning approvals that would exempt development

from Conservation Authority approvals. The Municipality lacks the expertise to assess natural hazards and does not wish to assume liability.

Waiving Fees

The Province proposes to waive development charges, parkland dedication and other requirements for additional dwelling units, not-for-profit housing, inclusionary housing, etc., the Municipality questions whether these savings, as provided to developers, will be passed on in lower unit purchase prices. After all, the consumer demand and willingness to pay remain higher than the building industry's capacity to supply. Development will, however, increase municipal service and infrastructure needs. The costs associated with this burden will be passed on to the existing tax base if not collected through development charges.

Site Plan Approval

Waiving site plan approval for residential developments of ten or fewer dwelling units will adversely impact public and municipal interests and developments. The site plan approval process currently provides a single mechanism to address relevant items such as parking, site grading, stormwater management, site servicing, servicing capacity, entrances, work on municipal lands, and sidewalk and road closures. These are essential considerations even for smaller developments. In the absence of site plan approval, municipalities will be forced to rely on (or create) a variety of other mechanisms and by-laws to address these interests, which will be less efficient than site plan approval and contrary to the intent of Bill 23 to reduce process.