

November 21, 2022

Honourable Steve Clark
Minister of Municipal Affairs and Housing
777 Bay Street, 17th Floor
Toronto ON M7A 2J3

Dear Minister Clark,

Re: More Homes Built Faster Act and Related Provincial Changes

On behalf of the Council of the County of Middlesex, I thank you for the opportunity to provide input on the proposed More Homes Built Faster Act and related Provincial changes. We would generally support the comments provided by the Association of Municipalities of Ontario (AMO) concerning the shifting of the cost burden of growth, undermining planning and community living, and exacerbating risks to the environment and human health. Further, we support the AMO recommendation that the proposed changes be deferred pending focused consultation. In addition to this, I wanted to highlight on behalf of Middlesex County Council four key areas.

To start, it is acknowledged that a few years ago the question of housing affordability would have been a low priority for our community as this challenge was largely an issue for our large urban neighbour. This is no longer the case as our rural and small urban County has significant housing affordability and attainability challenges that in many respects have outpaced our urban neighbours.

Review of A Place to Grow and Provincial Policy Statement

Your Government is undertaking a broad consultation on the Review of A Place to Grow and Provincial Policy Statement. This review suggests that the Place to Growth and Provincial Policy Statement documents could be combined into one Province-wide policy statement. We would simply note that the more prescriptive approach that A Place to Grow takes is likely not appropriate for relatively lower growth areas like Middlesex County.

We also recognize that the Provincial Policy Statement (PPS) sets the overall policy direction on matters of provincial interest related to land use planning and development. The PPS provides for growth and development while also seeking to protect resources such as prime agricultural lands and the natural environment. The PPS challenges municipalities to balance competing interests (and it can be a challenge). We hope that any outcome of the review of A Place to Grow and the PPS continues to provide the latitude to municipalities to balance competing interests including the protection of viable agricultural systems while also providing additional opportunities for housing.

Coordinated and Streamlined Planning System

Your Government has identified a Coordinated and Streamlined Planning System as a key priority. This is an area where we believe that Middlesex County was early out of the gate. Over the past number of years, we have worked to develop a land use planning policy and process framework that works for our communities and municipalities. This includes a coordinated and streamlined planning process that simultaneously respects decision making authorities of elected councils. To further this, the County of Middlesex in partnership with local municipalities is now implementing a web-based e-planning system and our municipalities and the County have already delegated certain responsibilities to staff. We can do more on this and I have directed that a fulsome review of additional delegations be undertaken with the new County Council to further streamline the planning system.

On a related note, it appears that the cumulative impact of the proposed changes to the Planning Act, the Conservation Authorities Act, the Ontario Wetland Evaluation System, and others, may be to place additional responsibilities on municipalities for Natural Heritage and Hazards when making land use planning decisions. There may be merit in examining this approach, however at present many rural and small urban municipalities do not have the capacity to undertake such responsibilities. Simply put, smaller municipalities have less internal staff capacity to review development related matters and therefore often have to rely on outside agencies or take additional time to review proposals. Municipalities should be allowed to continue to engage conservation authorities to undertake this work on their behalf, subject to negotiated memorandums of understanding. In addition, another approach may be capacity building through the establishment of a 'Rural Capacity Building Fund'.

Further, Middlesex County Council works closely with and supports the work of the local conservation authorities in stewardship programs such as the 'Clean Water Program'. We hope to be able to continue such voluntary local programs in partnership with conservation authorities.

Use it or Lose It Approvals

The land use planning framework within Ontario, as it is today, cannot compel developers to build homes. It is our experience that developers often 'bank land' and even sit on approved developments for various business and market reasons. Perhaps your Government could examine empowering municipalities to provide 'use it or lose it' approvals to more directly encourage the building of homes.

Infrastructure to Support Growth

Finally, as it relates to the responsibilities of the local municipalities within Middlesex County, it must be noted that rural and small urban municipalities struggle to fund the infrastructure necessary to support growth. Part of the answer might be the continued and focused provincial infrastructure funding for rural and small urban municipalities that are accommodating growth and thereby providing housing choices to Ontarians that want to live in the diverse communities found within rural Ontario.

As you know, rural and small urban municipalities often rely on Development Charges for the funding of infrastructure and any changes to the Development Charges Act should be considered through a rural and small urban lens so as not to be lost in changes proposed to address GTA challenges. The loss of local Development Charges may slow the ability of rural Ontario to support the provision of more housing while at the same time shifting costs to taxpayers.

Thank you and I look forward to continued dialogue on the provision of appropriate, attainable, and sustainable housing in Middlesex County and Ontario. I would be happy to discuss any of this with you or your staff.

Sincerely,

A handwritten signature in cursive script, appearing to read 'Alison Warwick'.

Alison Warwick
Warden Middlesex County
Mayor Thames Centre