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PORT HOPE

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## OFFICE OF THE MAYOR

November 28, 2022

The Honourable Doug Ford, Premier Government of Ontario Queen's Park, Legislative Building Toronto, ON M7A 1A1

Dear Premier Ford,

## RE: Municipality of Port Hope concerns with Bill 23, More Homes Built Faster Act 2022.

On behalf of the Municipality of Port Hope I am writing to express our deep concern regarding Bill 23, More Homes Built Faster Act, 2022. Bill 23 proposes significant changes to Ontario's Planning system in an unprecedented way in terms of scale and lack of consultation period.

While this municipality supports the government's objective to provide increased housing supply and improved affordability, there has been a distinct lack of municipal consultation in light of the most recent election period, effectively removing municipalities from the legislative process and undermining their ability to remain accountable, transparent, and responsible agents of change. This lack of consideration does not allow for a wider perspective to inform Provincial decision-making or speak to the hardships small municipalities with limited resources will face at the expense of local taxpayers and the natural environment as an outcome of this Bill.

The Municipality is aware and supportive of the many submissions from our fellow municipalities, agencies, and wide-ranging municipal sectors across Northumberland County and Ontario that speak to the impacts of Bill 23. Similarly, the Municipality of Port Hope would like to raise attention to the following concerns:

- 1. The proposed changes will prohibit municipalities from leveraging the expertise of their local conservation authorities, in our case the Ganaraska Region Conservation Authority. Small municipalities like Port Hope depend upon their conservation authorities to provide timely and value-added input on natural heritage, ecology and wetlands in the development review process as we do not have the required staff, resources, and expertise. Therefore, this will download new responsibilities on the small municipalities that are under-resourced and unprepared to manage.
- The proposed bill intends to increase the mix of housing supply in the Province on one hand and 2. reduce the amount of safe and accessible parkland on the other. However, lack of easily accessible parks in the new development proposals will not result in achieving the goals of

complete communities. We will be forced to increase the financial burden on current taxpayers to purchase new parkland for new residents.

- 3. The proposed bill also poses threats to the heritage properties by removing the listed properties from the heritage register leaving them with no heritage status or protection. Port Hope is particularly proud of our efforts in heritage protection driven mainly by volunteers and the proposed changes puts that all at risk.
- 4. The bill proposes threats to municipal financial stability by largely reducing the development charges and community benefit charges. This will significantly impact the taxpayer by shifting growth costs from developers to the existing taxpayers. There is no evidence that lower costs for homes will result, but clear evidence that increases to existing homeowners will occur.
- 5. The bill contravenes with the public participation principles required in the Provincial Planning Act by removing the third-party appeals and public meetings for subdivision applications. This will take away the democratic rights of the residents and make the tribunal a developers' only forum.
- 6. The bill proposes the removal of the items that the municipality can review as part of the site plan approval process, including urban design elements, architectural features, landscaping and any future sustainable development standards. As a heritage community, where our downtown core is the marketable brand of our community, it is important that the municipality can maintain the character of its heritage conservation districts. If approved in its current form, the Bill will allow for any modifications or new builds in the heritage conservation district without any adherence to the community heritage design standards.

The Municipality of Port Hope is of the opinion that the changes as proposed in Bill 23, *More Homes Built Faster Act, 2022,* will not result in the intended outcome and will only further worsen the housing crisis in Ontario, disproportionately placing the burden of development on municipalities, the natural environment and the local taxpayer.

While the Municipality is supportive of the Provincial government's efforts to provide affordable housing and increase housing supply, given the complexity and multi-dimensional character of the housing issue all levels of government must work together to address this challenge. The Municipality of Port Hope asks that more time be provided via consultation to allow for a thorough and comprehensive review of the proposed legislation so recommendations can be provided that allow for positive change.

We are also acutely aware of the decision the Province made to advance this bill during the election period and as new, inexperienced Councils continue to be sworn in.

We look forward to working with you and thank you for the opportunity to comment.

Yours truly

Olena Hankivsky Mayor, Municipality of Port Hope cc: David Piccini, MPP David Smith, CAO