



November 22, 2022

Planning Consultation Staff
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Re: **ERO Posting No. 019-6197**
Proposed Changes to Ontario Regulation 299/19: Additional Residential Units

Long Point Region Conservation Authority supports the government's commitment to streamlining processes and reducing unnecessary barriers to housing development. However, we are concerned that the proposed regulatory changes to O. Reg 299/19 Additional Residential Units may have unintentional, negative consequences. Rather than creating conditions for efficient housing development, this proposed change may jeopardize the Province's stated goals by increasing risks to life and property for Ontario residents.

1. Additional Residential Units should not be "as-of-right" in areas at risk of flooding.

The proposed changes to Ontario Regulation 299/19 Additional Residential Units under the Planning Act would allow additional residential units "as-of-right". The only exception noted in the proposal applies to legal non-confirming uses such as existing houses on hazard land. As proposed, the change would allow additional residential units on lots in floodplains unless the lot is designated or zoned hazard land.

There are thousands of homes in flood vulnerable areas in the LPRCA watershed. Almost all of these are appropriately designated and zoned for residential uses, with some other means of restricting additional residential units, and are not "legal non-conforming". Each municipality has its own way of dealing with existing development in flood prone areas. The as-of-right addition of hundreds more residential units in flood prone areas increases the risk to life and makes effective flood emergency response more difficult and costly. It is directly counter to the government's stated objective of "keeping people and property out of high-risk areas". The exception to the as-of-right should be reworded "except in flood hazard areas" or "except in areas at risk of flooding".

Thank you again for the opportunity to provide comments. We appreciate your consideration of the proposed changes in this submission to identify solutions that will increase Ontario's housing supply without jeopardizing public safety.

Sincerely,

Judy Maxwell, General Manager
Long Point Region Conservation Authority