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Monday, June 9, 2025
ERO number: 025-0462

The Honourable Doug Ford, Premier of Ontario
Sylvia Jones, MPP for Dufferin–Caledon
Ministry of Municipal Affairs and Housing
Ministry of the Environment, Conservation and Parks

To whom it may concern,

Thank you for the opportunity to comment on Bill 17, and its proposed amendments to the Development Charges Act, the Planning Act, and the Ontario Building Code. The implications of these changes are significant and could adversely affect our municipality and its residents

Development Charges Act Concerns:

1. Limiting the inclusion of land costs, which undermines the ability of new growth to cover its expenses.
2. Redefining capital costs to reduce eligible expenses, leaving a financial gap that burdens residents.
3. Deferring payment schedules to occupancy instead of the building permit issuance date weakens financial planning and accountability.
4. Prohibiting the inclusion of fees in subdivision agreements could lead to unmet local infrastructure needs.
5. Utilizing the planning application date instead of the building permit issuance time while prohibiting interest on deferred payments creates funding shortfalls.
6. Proposed regulations determining what counts as a local service could affect water-related charges.
7. Future changes that might mandate a standardized approach for benefit calculation and treasury reporting could constrain local fiscal management.

Planning Act Concerns:

1. Limiting complete application rules by excluding sun/shadow, wind, urban design, and lighting reports would hinder effective planning and compatibility in rural development.
2. Regulations allowing by-law variations without local compliance assessments undermine established local standards.

3. The expansion of Ministerial Zoning Orders (MZO) and removal of local municipal authority, including the requirement for ministry approval for Official Plan amendments, contradicts our governance autonomy.
4. Limiting the ability to require third-party peer reviews from certified professionals reduces development scrutiny which is essential for maintaining quality and standards.

Building Code Concerns:

1. Prohibiting by-laws from making green standards enforceable weakens our commitment to environmental sustainability and green initiatives.

The Township of Mulmur believes that local municipalities should retain the autonomy to govern and finance developments in a manner that best suits their unique needs and residents. We urge you to reconsider these proposals to maintain efficient, effective, and locally attuned governance.

Thank you for considering our position on these critical issues. We would welcome any dialogue to discuss our concerns further.

Sincerely,

Thank you in advance for considering the Township's comments.

Respectfully submitted,

Tracey Atkinson

Tracey Atkinson, BES MCIP RPP, M.M Dipl
CAO/Planner

TOWNSHIP OF MULMUR