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Our File: L11 2025 Bill 60

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To whom it may concern:

Re: Bill 60 – Fighting Delays, Building Faster Act

- **Proposed Changes to the Planning Act (Schedule 10 of Bill 60), ERO 025-1097**
- **Consultation on Enhanced Development Standards – Lot Level (Outside of Buildings), ERO 025-1101**
- **Consultation on Minimum Lot Sizes, ERO 025-1100**
- **Proposal to Amend the Ontario Water Resources Act to Enable the Regulation of Additional Sewage Systems under the Building Code to Support Construction of On-Farm Worker Housing, ERO 025-0900**
- **Streamlining Environmental Permissions for Sewage Works Servicing On-Farm Worker Housing, ERO 025-0872**
- **Policy Proposal to Regulate Additional Sewage Systems Under the Building Code to Support Construction of On-Farm Worker Housing, ERO 025-0899**
- **Implementing Reforms to the Development Charges Framework, 25-MMAH030**

Attached is the County of Oxford's submission in response to the proposed legislative framework outlined under Bill 60, *Fighting Delays, Building Faster Act*, as posted for public consultation on the Environmental Registry of Ontario (ERO) and Ontario Regulatory Registry as it pertains to the above noted postings and consultations.

The County has reviewed the details of the proposals as outlined in the public consultation postings noted above, including all related consultation materials. This submission presents a range of preliminary comments, questions, and concerns identified by the County regarding the proposed legislative changes. Given that the proposals are currently high-level and no draft implementing regulations have yet been released, these comments are intended to provide early input and highlight areas where further clarification, guidance, or safeguards may be needed.

Overall, the proposed amendments under Bill 60 and related consultations referred to in this correspondence present a mix of potential for administrative efficiencies and notable policy concerns for the County. While some changes may streamline processes or enhance transparency, others, if not carefully considered and implemented, may risk weakening local autonomy, continued uncertainty, and increasing potential environmental and financial vulnerabilities.

The County continues to emphasize the importance of maintaining a balanced, locally informed approach, while also supporting provincial goals without compromising sound planning principles, municipal decision-making authority, environmental protection, or public confidence. Our comments, as attached, underscore the need for provincial initiatives to be flexible, transparent, and responsive to municipal input and local conditions to ensure effective implementation over the long-term.

Oxford looks forward to continued and meaningful consultation with the Province as draft implementing regulations are developed and anticipates providing additional input as more detailed regulatory information becomes available.

Thank you for the opportunity to submit comments on the proposed legislative changes. The County looks forward to meaningful and continued consultation with the Province on the proposed changes and the related comments and concerns that the County has raised, and on any future draft regulations when they are available. If you have any questions regarding the County's submission, please feel free to contact April Nix, Manager of Planning Policy at anix@oxfordcounty.ca or by phone at 519-539-9800 ext. 3208.

Sincerely,

Paul Michiels
Director of Community Planning
County of Oxford

/an
Via Email

Proposed Changes to the Planning Act (Schedule 10 of Bill 60), ERO 025-1097

Ministerial Decisions Not Required to be Consistent with Provincial Policy

A new subsection 3 (5.1) provides that a decision of the Minister, other than a part of the decision that applies to land in the Greenbelt, is not required to be consistent with the Provincial Planning Statement.

Oxford County is concerned that the proposed amendment, which would exempt ministerial decisions from the requirement to be consistent with the Provincial Planning Statement (PPS), could undermine the transparency, accountability, and predictability that form the foundation of Ontario's land use planning system. The PPS is a vital instrument that translates the Province's interests under Section 2 of the *Planning Act* into clear, consistent policy direction for all planning authorities. It ensures that decisions at every level of government are made within a clear, coherent and balanced framework that serves the long-term public interest.

Exempting the Minister from this requirement, without any scoping or limiting criteria, could erode the integrity of that shared framework and risk introducing uncertainty into the planning process. It creates a situation in which the Province is not held to the same standard as municipalities, potentially leading to inconsistent, contradictory, or ad hoc decision-making. Such an approach could further diminish public confidence in the transparency, fairness, and predictability of land use decisions and weaken the collaborative foundation on which Ontario's planning system is built.

Accordingly, the requirement for ministerial decisions to be consistent with the PPS is essential to upholding the principles of good governance, transparency, and accountability and to ensuring that Ontario's planning system continues to serve the public interest effectively and equitably and should generally be maintained. As such, we would respectfully request that the Province re-consider this proposed change or provide further details as to the Province's rational for this proposed change and associated scoping criteria for further municipal review and input.

Expanding the Use of 'As of Right' Minor Variances

Further, proposed changes to S. 34 will allow for specific minor variances to a Zoning By-Law to be permitted "as of right" up to a pre-determined percentage of existing zoning standards (which have yet to be determined).

It is the County's understanding that these proposed changes build upon the recently legislated amendments in Bill 17 to extend as of right minor variances beyond "setback distance" (e.g. to include lot coverage, height, etc.) on specified lands, namely "parcels of urban residential land outside the Greenbelt Area." While the County supports the Province's efforts to streamline development approvals and improve efficiency for relatively minor changes to zoning standards, these measures must preserve flexibility for municipal oversight to ensure decisions appropriately reflect local context and policy frameworks.

The application of a percentage (e.g. 10%) could be seen as setting a standard for the meaning of 'minor' with respect to variances of other zoning requirements, further weakening the established four-tests which recognize the site-specific nature of variances. A percentage reduction could represent a small physical measurement or a large physical measurement depending on the original setback requirement, but the potential impact is independent of numerical measurements. As a whole, the proposed exemption would by-pass consideration of the Province's own criteria (i.e. the four tests), as well as the County's own criteria contained in the Official Plan. Attempts at such automatic percentage reduction approaches are certainly not new and have been tried by some municipalities in the past. However, as one would expect were typically found to simply create a defacto lower standard (e.g. with a 10% reduction, a 10 m
10 setback is now really just a 9 m setback. So, if that is always appropriate, why not just revise the zoning by-law to establish a 9 m setback).

The County maintains that a more effective means of achieving the Province's objectives would be to delegate (or allow municipalities to delegate) approval authority for certain types of minor variances to municipal officials, while retaining the ability to apply the *Planning Act's* four tests and other local criteria, as appropriate. This approach would uphold consistent application of established planning principles, while still achieving streamlined approvals, rather than relying on an arbitrary, province-wide numerical threshold (e.g. 10 percent). Fixed percentage limits risk undermining the intent of the four tests and may lead to outcomes that are inconsistent with local policies or sound planning practice.

The County supports the Province's proposal to exclude hazardous lands and areas near shorelines or railways from 'as of right' permissions for specified minor variances, but recommends extending these exclusions to natural heritage features, municipal drains, roads, intersections, and infrastructure corridors, as these areas often present environmental sensitivities, safety risks, and functional constraints that require site-specific review and coordinated planning to ensure appropriate and sustainable development.

Lastly, the County encourages the Province to release any draft regulations for municipal review and comment prior to enactment to ensure clarity, consistency, and effective implementation.

Consultation on Enhanced Development Standards – Lot Level (Outside of Buildings), ERO 025-1101

The Province is proposing changes to streamline, standardize, and prohibit the mandatory use of enhanced development standards that do not relate to maintaining health and safety. The current consultation is intended to gather input from stakeholders (including municipalities, planning professionals, and homebuilding/construction sectors) on the current state of affairs, limitations, and challenges associated with municipalities' use of enhanced lot level development standards.

Municipalities currently use a range of land use planning and other tools (e.g. zoning by-laws, site plan control, development agreements, general design standards etc.) to ensure that various important lot level development standards are met. There is no definition of 'enhanced development standards' in the Planning Act, or the Provincial Planning Statement, and these requirements currently vary across jurisdictions.

Examples of enhanced development standards may include requiring features such as:

- bioswales, permeable pavement, and other passive stormwater management features (also known as "low impact development" which is defined in the PPS);
- specific plantings/landscape elements such as specifications for street trees, vegetation within parking lots, native species plantings etc.; and
- active transportation elements, such as bicycle parking, bike or car share parking, benches, walkways/trial connections, etc.

Furthermore, many local requirements tied to landscaping, grading, and related design considerations are directly informed by other municipal plans, by-laws, and related tools (e.g. tree by-laws, site plan guidelines, various design standards etc.), many of which may have had the benefit of input from the broader community and legislated advisory groups/committees (e.g. Accessibility, Planning Advisory, Heritage etc.). As such, any Provincial standards should ensure sufficient flexibility to continue to appropriately accommodate local objectives, contexts, and community input.

The area municipalities within Oxford all have site plan guidelines, and related standards to inform site plan review/approval and the requirements for "enhanced" development standards. While these requirements vary, they are currently limited to landscaping and grading requirements and pedestrian connections/amenities. The County, along with the area municipalities, has been investigating the use of "low impact development" standards and other ways to mitigate stormwater flows and the potential for urban flooding. The County encourages the Province to continue to permit municipalities to have the authority to develop and implement low impact development standards in keeping with the Province's Flooding

Strategy. The Flooding Strategy assigns the responsibility for mitigation (i.e. keeping people and property out of flood-prone areas and taking steps like floodproofing and other approaches to reduce the impact of flooding) to municipalities and other government authorities. Further the PPS states that planning authorities "shall prepare for the impacts of a changing climate that may increase the risk associated with natural hazards" and that means mitigating increased stormwater flows before they aggravate existing natural hazards.

Ontario's flood prevention strategy combines several approaches, including improving flood risk information, upgrading infrastructure, and using nature-based solutions. Accordingly, many municipalities are exploring implementing a variety of nature-based solutions to reduce the likelihood and impact of flooding. Nature-based solutions are often more cost-effective, either in the construction phase or over the life cycle of the system; however, they may require site level design elements over a broader area to function adequately, which requires that developers of individual properties design, implement, and maintain certain features. Currently, the primary mechanism for municipalities to require developers to provide these features on a lot specific basis is through site plan control and associated agreements.

Further the PPS states that planning authorities should permit development that supports the achievement of "complete communities" and a "compact built form". The definition of "complete communities" includes "support[ing] opportunities for equitable access to many necessities for daily living" and "compact built form" includes the concept of walkable neighbourhoods which "can be characterized by roads laid out in a well-connected network, destinations that are easily accessible by transit and active transportation, sidewalks with minimal interruptions for vehicles access, and a pedestrian-friendly environment along roads". The PPS objectives above require municipal standards, guidelines, and review through site plan control to ensure appropriate implementation.

Accordingly, the County encourages the Province to allow municipalities to retain the authority to require appropriate enhanced lot level development standards. Provincial standardization and guidance may be helpful, particularly to smaller municipalities who lack the resource to study and develop their own guidelines. However, given the complexity and local variations across the province, the provincial standards and guidelines should remain sufficiently flexible to allow local approaches that achieve the same objectives.

The Province should also produce, and meaningfully consult with municipalities on, any proposed standards or limitations prior to their finalization. This will help to ensure clarity and avoid negatively impacting the ability of municipality to ensure new development is both functional and supports the achievement of complete, safe, and sustainable communities.

Consultation on Minimum Lot Sizes, ERO 025-1100

The Province is seeking feedback on the benefits and/or risks associated with reducing or removing minimum lot size requirements in low-density urban residential areas to encourage gentle density, increase housing supply, broaden housing options, and encourage home ownership. A more permissive approach to lot size requirements may also have the effect of increasing the number of low-rise homes in urban residential settings without significantly changing the neighbourhood's look and feel.

Further, the Province would like input on the following questions:

- What are best practices observed in other jurisdictions that have introduced minimum lot size reforms?
- Are there any circumstances where having established minimum lot sizes in municipal zoning by-laws for low-density urban residential parcels are necessary with respect to the provision of transportation, infrastructure, or upholding public health and safety?
- Given the Ontario context and the government's permissions for additional residential units, what do you suggest should be the smallest size urban residential lot in terms of lot area, frontage or depth (i.e. six metre frontage, 200 square metres area, etc.) What would be the opportunities and limitations? How would these standards work together?

- What other zoning requirements or performance standards could be needed to support any reduction or removal of minimum lot size requirements on low-density urban residential parcels (i.e., additional residential units, multiplexes, parking requirements, lot coverage, height and density etc.)?

In the County of Oxford, the area municipal zoning requirements for minimum lot area in a fully serviced settlement depend on the type of dwelling and range as follows:

- Single detached dwelling - 290-465 m^2 (3,122-5,005 ft^2), and 340-608 m^2 (3,660-6,545 ft^2) for a corner lot.
- Semi-detached dwelling - 270-315 m^2 (2,906-3,391 ft^2), and 360-450 m^2 (4,844 ft^2) for a corner lot.
- Street-fronting townhouse dwelling - 150-240 m^2 (1,615-2,583 ft^2), and 240-330 m^2 (3,552 ft^2) for an end unit and 330-420 m^2 (3,552-4,521 ft^2) for an end unit on a corner.

Minimum lot area in fully servicing settlement areas is generally related to maintaining the character of an area and providing separation between buildings. Important health, safety and functional matters, such as stormwater management, fire separation, and maintaining adequate space in the public right-of-way for public utilities and amenities, are largely addressed through other zoning controls, such as minimum lot frontage, minimum lot depth, minimum yards/setbacks, maximum lot coverage, minimum parking spaces, and minimum landscaped open space.

Provided municipalities continue to have the ability to regulate these other zoning provisions, elimination of the minimum lot area in a fully serviced settlement area, on its own, is not likely to have a significant impact on ensuring public safety and the functionality of lots. However, minimum lot sizes can serve as a simple proxy for ensuring the lots being proposed (i.e. through a plan of subdivision or severance) will be of sufficient size to accommodate the dwelling types permitted by the zoning in compliance with all other applicable zoning provisions (i.e. not allow for the creation of lots, then have developers/purchasers later realize they cannot reasonable accommodate a dwelling and required parking and outdoor amenity areas, while still meeting minimum setbacks, maximum lot coverage, and other requirements). That said, it is recognized that the establishment/maintenance of excessive minimum lot sizes could also potentially be utilized by some as a means of ensuring only low density, large lot, single detached development in certain communities, or areas and discouraging reasonable infill.

For the above reasons, setting a reasonable Province wide minimum lot size standard/expectation for fully serviced communities could potentially be one way of ensuring all municipalities are doing their part to ensure efficient use of prime agricultural land and infrastructure and support the creation of complete communities (i.e. by providing for smaller lots that can support more affordable housing options). However, this same objective would likely be better achieved by setting a reasonable Province wide minimum residential density for all fully serviced communities (as the County has recommended in past consultations) This approach would both ensure new development could not consist exclusively of large, single detached lots, while also providing greater flexibility for municipalities to determine how that Provincial direction could best be achieved in their particular local context (i.e. in a large urban settlement with transit and/or employment and services within walking distance, versus smaller, fully serviced settlements that do not currently have centralized facilities for managing stormwater from denser development or transit and/or limited employment and other services, requiring more frequent use of personal vehicle).

Therefore, it is the position of Planning staff that a more effective, comprehensive, and flexible approach would be for the Province to simply establish a reasonable minimum residential density requirement for all fully serviced communities, rather than simply prescribing minimum lot size standards. However, if the Province concludes there is also still a need to regulate minimum residential lot sizes, they should set a minimum size standard (rather than complete elimination of the requirement) that is reasonable and appropriate for smaller urban/rural fully serviced settlements (i.e. not just large urban), or is differentiated based on the type (i.e. smaller rural vs. urban) and/or size of settlement. This would help to avoid the potential creation of very small, remnant, and/or irregularly shaped lots (i.e. that cannot be reasonably developed in accordance with all other local zoning standards and requirements) and maintain orderly patterns of development.

Also, the Province should clarify whether such minimum standards are intended to apply to all development (i.e. including existing developed residential areas), or just new greenfield developments where such standards can be comprehensively factored into the overall planning and design of the development (i.e. roads, active transportation connections, sewers, stormwater infrastructure, parkland, public services, access to day to day services, etc.).

Before proposing any specific direction in this regard, the Province should understand that all zoning provisions are evaluated in detail by municipalities through the review of applications for development (e.g. draft plan of subdivision and consent). As such, they are typically tailored to the specific development based on consideration of development specific factors (e.g. the type of dwellings units, stormwater management/drainage plans, parking arrangements, grading, etc.) Accordingly, there is a difference between existing development and new development, not only in terms of the 'acceptance' of proposals by the residents and maintaining character, but also in terms of comprehensive consideration of the impacts of the form of development. Further, certain key character areas, such as those designated as cultural heritage landscapes and/or cultural heritage districts, should be exempt from any proposed legislated standard.

As a means of addressing some of the above noted considerations and concerns, while also achieving the Province's stated objectives, the Province could consider the more flexible approach of working with municipalities to develop a residential zoning best management practices guideline with specific practical examples to assist municipalities in establishing appropriate zoning provisions (including lot area) for various forms of ground oriented residential development (i.e. small lot singles, semi's, townhouses, multiple unit dwellings etc.) in various fully serviced settlement contexts (e.g. large urban/transit serviced vs. smaller urban and rural settlements), versus simply prescribing specific minimum or maximum zoning standards

As a starting point for further discussion with municipalities in this regard, the Province should consider providing an example of what they feel might be a reasonable minimum residential lot area for various dwelling forms (e.g. 200 m^2 for a single detached dwelling and semi-detached dwelling and 150 m^2 for a street-fronting townhouse dwelling) in a new fully serviced, greenfield residential development (i.e. where the lotting and road patterns, infrastructure, public services etc. can be appropriately designed to accommodate the form of residential development and smaller lot sizes from the outset), together with examples of the typical housing forms that could potentially be accommodated while providing for appropriate on-site parking, min. yards/setbacks, outdoor amenity space etc.).

Other Zoning Provisions

It is crucial that municipalities continue to be able to determine and establish appropriate minimum lot frontage, maximum lot coverage, and minimum landscaped open space requirements, as these are based on local stormwater management, parking, and street function/utility requirements and, therefore, need to be tailored to the particular settlement and/or development context. Maximum lot coverage and minimum landscaped open space are typically determined based on stormwater management plans and strategies. Minimum frontage requirements are related to the provision of on-site parking spaces, street trees, street parking, fire hydrants and utility boxes, drainage, snow storage, transit stops, etc.

It is also important to note that all zoning provisions are evaluated through the review process for new development and are often amended through that process to reflect development specific factors, such as the type of dwellings units, stormwater management/drainage plans, parking arrangements, grading, etc.

Various Proposals to Support the Construction of Servicing for of On-Farm Worker Housing under the Ontario Water Resources Act (ERO 025-0900), Building Code (ERO 025-0899), and Environmental Protection Act (ERO 025-0872)

The three related ERO postings propose regulatory amendments to streamline approvals for septic systems serving on-farm worker housing. Together, they would increase the cumulative design capacity threshold from 10,000 to 50,000 litres per day per agricultural property and shift many systems from requiring an Environmental Compliance Approval under the Ontario Water Resources Act to being regulated under the Building Code Act through a registration process in the Environmental Activity Sector Registry (EASR). The intent is to simplify approvals, reduce delays, and support the construction of on-farm accommodations while maintaining design, monitoring, and environmental protection standards.

The County of Oxford is generally supportive of the Province's objective to reduce unnecessary delays and enable the timely construction of on-farm worker housing while protecting public health and Ontario's water resources. The County recognizes the importance of seasonal and temporary agricultural workers to our local and provincial economy and supports measures that assist the agricultural community in providing safe, adequate on-farm accommodations.

However, the proposed regulatory amendments, which would increase the cumulative design capacity threshold for on-farm sewage systems from 10,000 L/day to 50,000 L/day per agricultural property and shift oversight from the Environmental Compliance Approval process to the Building Code Act through the Environmental Activity Sector Registry (EASR), represent a significant change to how private servicing is managed in rural areas. The County offers the following comments and recommendations to strengthen environmental safeguards, clarify implementation, and maintain local coordination.

Oxford County recommends that the Province require a mandatory hydrogeological assessment for proposed systems exceeding 10,000 L/day, or where provincial mapping identifies aquifer vulnerability, proximity to municipal or private wells, or sensitivity to surface water. Given that a cumulative capacity of 50,000 L/day is comparable to that of small settlement areas, it is essential that higher-risk sites be subject to greater technical scrutiny to prevent groundwater contamination and cumulative impacts including over the long term.

Further, the County requests that the EASR registration process include mandatory notification to the local municipality, public health unit, and conservation authority (where applicable) at the time of registration and prior to occupancy. Municipalities should retain the ability to review applications for consistency with Official Plan servicing policies, source water protection requirements, and local property standards. In addition, Oxford County would also request that the Province ensure the proposed regulatory changes align with municipal land use planning frameworks and rural servicing policies. Ongoing coordination with local planning authorities will be essential to ensure that expanded private servicing capacity does not conflict with long-term land use, groundwater protection, or growth management objectives.

Clarification is also needed on how the 50,000 L/day cumulative capacity applies across contiguous or commonly owned parcels. Without a clear definition of "agricultural property," there is potential for systems to be distributed across multiple lots to avoid higher scrutiny. Oxford County recommends that the definition of "agricultural property" reflect both functional use and ownership, rather than relying solely on parcel boundaries. One possible approach could be to define it in terms of the "farm operation," recognizing that multiple parcels may be operated together as a single agricultural business, while still maintaining accountability for cumulative servicing capacity.

Further, the County supports the inclusion of environmental protection measures within the proposed framework but recommends that these be detailed and enforceable. Specifically, the Province should establish:

- Minimum design, effluent quality, and setback standards that meet or exceed current Ontario Water Resources Act requirements.

- Ongoing monitoring and annual reporting to the Ministry of the Environment, Conservation and Parks and local public health units.
- Third-party certification by qualified professionals for design and installation of larger systems or systems located in areas of higher risk.
- Periodic compliance inspections or audits and clear penalties for non-compliance, supported by dedicated enforcement funding or cost-recovery mechanisms for municipalities and health units.

Implementing Reforms to the Development Charges Framework, 25-MMAH030

The Protect Ontario by Building Faster and Smarter Act, 2025 created a regulation-making authority that authorizes the Lieutenant Governor in Council (LGIC) to merge services for the purpose of Development Charges (DC) credits. Using this authority, the government is proposing to merge water supply services and wastewater services for the purposes of DC credits. This would enable a developer with a credit that relates to one of those services to use the credit towards DCs for either or both services.

Comments received from Watson and Associates indicate that combining the services for the purposes of credits would have cashflow implications for municipalities where funds held in a DC reserve for a service not included under the agreement would be reduced. This could potentially delay the timing of capital projects for the impacted services and/or increase financing costs.

This change would not directly impact the County as water and wastewater DCs have not been separated into different categories (i.e. the County does not have a DC for Water Supply and Storage and a separate DC for Water Distribution).

When determining its DCs, municipalities must take into consideration the extent to which an increased need for service because of new growth would benefit existing development (BTE). The portion of a service increase that benefits existing development is not eligible for DCs.

To help make BTE allocations more transparent the government is proposing that DC background studies would be required to set out the following:

- For each service, a description of the methodology used to determine the allocation of total costs that would benefit new development and existing development, including any assumptions made.
- For each service, a description of the methodology used to determine the allocation of total costs during the term of the DC by-law that would benefit new development and existing development, including any assumptions made.

While this change would likely result in a slight increase in the costs to prepare a DC background study the County is in support of this change as it will enhance transparency for stakeholders. The proposal suggests that methodology be provided by service, however there may be situations where the determination is required at a project level, and it is not clear from the proposal if / how this could be achieved.

The government is proposing that land acquisition costs for almost all DC-eligible services would be required to be included in a new service class, meaning land acquisition would be considered a separate service in background studies in determining DCs and for the purposes of DC reserve funds.

Comments received from Watson and Associates indicates that the impacts of this change would vary across municipalities. Where land values are significant, the removal of these amounts from levels of service calculations would result in a decrease in the DC eligible amount that may restrict DC funding for future capital projects. For any service areas at or near the level of service cap this will likely reduce the amount of DC funding, increasing the portion of projects required to be funded by means other than DCs.

From the County's standpoint this may lead to an increase in the Levy or Rates to fund these costs. While a detailed analysis of potential impacts would require assistance from the County's Development Charge

Consultant at a cost, the County did not reach the level of service cap through the 2024 Development Charge Background Study.

This change would require the creation of a separate DC reserve fund and rate, resulting in minor administrative impacts to manage the costs and funds separately.

Once a new DC Background Study is completed, the capital costs for land must be included in the class of service for land acquisition and funded from the related DC reserve. This may require transfer of funds between DC reserves for projects included in the existing DC Background Study.

Making the information in financial statements relating to DCs (commonly referred to as treasurer's statements) more transparent and accessible would enable a more comprehensive understanding of DC funds collected and their use in funding growth-related infrastructure.

To do this, the government is proposing that for each project financed by DCs, municipalities would be required in a treasurer's statement to:

- Identify the amount from each reserve fund that was committed to a project, but had not been spent, as of the end of the year;
- The amount of debt that had been issued for a project as of the end of the year; and
- Identify where in the DC background study the project's capital costs were estimated. This would not apply in circumstances where a municipality uses a unique identifier in both background studies and treasurer's statements to identify each project.

The additional requirements will increase the administrative effort required by staff in preparation of the annual statement. The County is in support of this change as it increases transparency, and staff feel the administrative effort is manageable within existing staff workload.

The following are additional changes proposed through Bill 60, not specifically mentioned for comment within the proposal posted to the registry:

Bill 60 proposes the annual Development Charge Treasurer's Statement must be completed each year by June 30th. Currently the timeline is determined by Council. Historically the County has completed the Development Charges Annual Report in April and therefore has no concerns with the proposed legislation providing a specific date.

In addition, Bill 60 proposes to change the requirement to provide a copy of the statement to the Minister of Municipal Affairs and Housing upon request, to provide by July 15th of each year. The change to a mandatory requirement to provide the statement is very minor in nature and staff see no concerns with this change.

Bill 60 proposes changes to give a copy of the background study and by-law to the Minister of Municipal Affairs and Housing on request, by the deadline specified in the request. As the documents are posted on the County's website, they are readily available, and County staff have no concerns with this proposed change.

Section 59 of the DC Act delineates between charges for local services, and by extension, capital projects that would be considered in a DC by-law. Policy 6.23 Local Services Policy assists in establishing which capital works will be funded by the developer as a condition of approval under Section 51 or Section 53 of the Planning Act, and which will be funded by the DC by-law.

Amendments through Bill 17 allowed the Province to make regulations to determine what constitutes a local service.

Bill 60 adds a new section to the DC Act with respect to local services policies and that reference to each service included in a DC By-law must be included. The proposed section also indicates that the local services policy is required to be provided to the Minister of Municipal Affairs and Housing upon request, and that the policy must be approved by resolution at the time a development charge by-law is passed.

Policy 6.23 Local Services Policy would require update with the inclusion of the land purchase class, however there is no immediate impact to the County as the Policy is currently approved through resolution.