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November 22, 2025

Ministry of Municipal Affairs and Housing
Provincial Planning Branch
13th Floor, 777 Bay Street
Toronto, ON, M7A 2J3

Submitted via the Environmental Registry and email: PlanningConsultation@ontario.ca

Re: County of Grey Comments on Bill 60, Fighting Delays Building Faster Act, 2025, and Associated Regulations / Consultations in Response to Environmental Registry and Regulatory Registry Postings: 025-1097, 025-1099, 025-1101, 025-1100, 025-1071, 025-0899, 025-1140, 25-MMAH018, 25-MMAH030, 25-MAG017, 25-MMAH024, 25-MAG019, 25-MAG016, and 25-MAG025.

Dear Ministry Staff:

Thank you for the opportunity to comment on the above-noted Environmental and Regulatory Registry postings on Bill 60, the Fighting Delays, Building Faster Act, 2025 and the related Environmental Registry consultations. At the November 13, 2025 County of Grey Committee of the Whole meeting, the following resolution was passed:

“That the information regarding Bill 60 from the Legislative Assembly of Ontario be received; and

That staff submit comments in response to the Environmental Registry of Ontario Posting for Bill 60 - Fighting Delays, Building Faster Act, 2025, ahead of Council approval as per Section 26.6 b of the Procedural By-law.”

Grey County offers the following comments in the spirit of partnership, and as a means by which to collaborate with the province with ongoing legislative and regulatory changes.

Environmental Registry Posting [025-1097](#) Proposed Changes to the Planning Act (Schedule 10 of Bill 60 – the Fighting Delays, Building Faster Act, 2025)

The County offers the following comments as it pertains to the proposed changes to the Planning Act.

Community Improvement Plans

The County of Grey welcomes this change and applauds the province on permitting all upper-tier municipalities to have community improvement plans (CIPs). Allowing Grey County the ability to offer an upper-tier CIP would permit the County to make strategic investment in affordable housing or infrastructure, alongside our member municipal CIPs.

Minor Variances (As-of-right Variations from Performance Standards)

The County sees merit in permitting some flexibility in zone standards, without the need for a minor variance. However, such flexibility should not be applied in a 'carte blanche' across the board fashion (e.g., up to 10% variances on all urban residential lands).

There are some zone standards that exist for both public safety and practical standards e.g., allowing for proper snow storage, access to rear yards, or the location of infrastructure. The County recommends that the province consider allowing for the following:

1. An exemption to the public circulation and public hearing requirements for minor variances within defined limits,
2. That delegated decision making on minor variances within those same defined limits be required to be delegated to staff, vs. being approved by a committee of adjustment, and
3. The requirement for all minor variances, whether delegated to staff, or via a committee of adjustment, is still required to meet the four tests of a minor variance.

The 'impact' of a minor variance has never been purely a numeric assessment, i.e., some variances may propose a 50% reduction in a zone standard and still be considered minor and acceptable. Conversely, a minor variance with a lesser percentage reduction may not be minor based on the impact on services or other practical reasons. As such, allowing some greater delegation of approvals, while still requiring the four tests to be met, could expedite decision making, in accordance with the intent of the province.

Policy Statements and Minister's Decisions

The County does not support the proposal for Minister's decisions to no longer need to be consistent with the Provincial Planning Statement (PPS) or provincial plans, whether on a Minister's Zoning Order, or through the approval of an official plan or official plan amendment. Public transparency in decision making and the planning process is paramount on projects which meet the scale of a MZO, a new official plan, or official plan amendment. If the province passes a new provincial plan, or PPS, after public

consultation, which then all municipal decisions then need to conform to, and be consistent with; then the province should also be 'held to the same standard'. The province can always amend provincial plans, or update the PPS, if there are policies that need to be reconsidered. However, allowing for 'one-off' exclusions to such policies and plans by the Minister, which are then ineligible for appeal by municipalities or the public, erodes trust and transparency in the system.

Minister's Zoning Orders

The County sees merit in using Minister's Zoning Orders (MZO) only on a very limited basis. Proper municipal and indigenous consultation should be considered mandatory prior to considering a MZO. Should the province be looking to expedite the MZO process by not requiring a regulation to be passed, then one further area for streamlining is as follows. Following the approval of a new MZO, and retroactive on existing MZOs, municipalities should be returned the ability to modify MZO provisions (after approval) in their local zoning by-laws or via minor variance. While MZOs expedite the existing approvals, once approved, MZOs can be a barrier where a landowner requires additional zoning changes within a MZO, by needing to return to the province for approval, vs. being able to pass a zoning amendment through the local municipal council.

Environmental Registry Posting [025-1099](#) – Consultation on simplifying and standardizing official plans

A. Official Plan Structure and Contents

What is your perspective on the changes being considered to simplify and standardize the structure and contents of official plans?

The County sees merit in some standardization in official plans across the province. Use of common terminology through definitions is an area where there is certainly room for standardization. Some common permitted uses and designations / constraints could also be a positive step forward.

However, a 'one-size fits all approach' to official plans, is not recommended. In many smaller and rural municipalities, the official plans are already quite concise (i.e., under 100 pages) and are written to best serve the goals and objectives of their community. A common standard which applies to a large urban municipality, and a small rural municipality, could have the unintended consequence of adding complication to what was otherwise already a concise and permissive rural official plan. Additionally, the Proposed Standard Chapter Order for Official Plans includes no reference to

sustainability or climate change considerations in growth planning. This gap undermines municipalities' ability to ensure that new development contributes to safer, healthier, and more sustainable communities, that are more desirable to live in.

What distinctions should be made between the content of upper and lower-tier official plans? What considerations should apply in municipalities where the upper-tier official plan acts as the lower-tier official plan?

The County sees merit in reducing areas for duplication between upper and lower-tier official plans. In Grey County, the County Plan provides population projections and allocations, a natural heritage system, and agricultural / rural policies and mapping. The County Plan provides very scant policies within settlement areas, beyond setting the settlement area boundary mapping and some very broad policies. As such, municipal official plans are encouraged to focus their policy efforts on the settlement areas, rather than duplicating the County's natural heritage system and agricultural / rural policies. Some municipalities in Grey have no municipal official plans in the agricultural / rural areas and only have the municipal official plan for their settlement areas. In doing so, this limits duplication, and reduces those scenarios where someone may otherwise need a municipal and county official plan amendment for their development (beyond a settlement area boundary expansion).

Another possible model in this regard would be to mimic the Oxford County model, whereby there is only one official plan for the County, and municipal policies are chapters within a broader county official plan.

Finally, where there has already been a provincial decision on the complete application requirements in an upper tier official plan by the Ministry, then further approval or consultation should not be required on the lower-tier official plan, if they utilize the same list of studies. This appears to be unnecessary bureaucracy which will cause delays for no additional benefits.

What is your perspective on limiting development standards in official plans? To what extent should development standards be set out in official plans vs in zoning by-laws?

The County sees merit in setting broad development standards at the official plan level, e.g., density ranges within settlement areas, minimum farm sizes in agricultural areas, maximum rural lot densities for rural consents, adjacent lands areas for natural heritage system mapping, and desired road allowance widths (for the purposes of acquiring road widening). Beyond that, the County supports deferring most other development standards to zoning by-laws.

What is your perspective on the changes being considered regarding secondary plans and site-specific policies? Are there other ways to address these policies?

Secondary plans are not widely used in many parts of rural Ontario. The County supports their use in larger growth centres, but does not take any position overall on the use of secondary plans. Secondary plans can play an important role in energy system planning, making them a key opportunity for municipalities to collaborate with developers and shape energy strategies that align with local needs.

The ability for site-specific policies at an official plan level, or at an individual lot level, should be retained, for community or site-specific details/considerations.

What is your perspective on the number and types of standardized schedules, overlays and data proposed to be required? Should any be removed, or are there any other schedules that could help improve official plans?

As per above, a one-size-fits-all approach does not best serve the diverse communities across Ontario. The province could suggest common schedules or overlays, but the ability to modify or omit said schedules should be retained at the municipal level. Particularly in a two-tier municipal government, there may be some schedules only needed at the upper-tier level, and vice versa at the lower-tier level.

B. Limiting the Length of Official Plans

What is your perspective on the changes being considered to limit the length of official plans?

The County does not support an arbitrary limit on the length of official plans via a page count or a word count. The County can support some standardization in terminology, designations, constraints, and limitations on the breadth of development standards; but does not support a limitation on the overall length of a document.

Although not directly related to the length, both climate change and healthy communities policies seem conspicuously absent from the content in the ERO posting. Both topics are crucial to the sustainability and health of communities going forward. Both topics are also matters of provincial interest, as per section 2 of the Planning Act.

Should there be different limits placed on different types of municipalities (e.g., based on population size)?

The County does not believe population size is a reasonable arbiter for placing limits on municipalities. For example, a purely small urban municipality may still have a similar population as a municipality which is a mix of urban and rural areas. The urban/rural municipality has a need for both urban and rural policies, and as such will need a lengthier official plan than the small urban municipality.

Are there other approaches that could be used to limit the length of official plans?

As per above, there may be some streamlining or limitations placed on upper and lower tier official plans which could help avoid duplication, and have the effect of limiting the length of some official plans.

C. Creating Permissive Land Use Designations

What is your perspective on the changes being considered to standardize the number and type of land use designations?

The County generally supports the broad categories of land uses contained in the ERO posting.

Would standardized land use designations between upper-tier and lower-tier official plan improve clarity? Where are the opportunities to reduce duplication between the upper and lower-tier official plans in land use designations?

See above comments on the County of Grey Official Plan vs. member municipal official plans. If the County Plan provides the settlement area boundaries/types, agricultural, rural, natural heritage system designations / mapping, then the municipal official plans can then provide the detailed designation mapping within settlement areas for residential, mixed use, employment, open space, etc.

Are there additional designations that would be required? Are there opportunities to streamline or further combine some of the proposed designations (e.g. Residential I and II, and Mixed Use I and II)?

The County suggests that some further thought be given to recreational or resort areas, as well as the servicing impacts of the broad designations described above i.e., an

employment area on municipal servicing, vs. an employment area on private individual services can be quite different.

Are there implications to making land use designations more streamlined and permissive?

The impact on infrastructure and service delivery are likely the biggest potential impacts. Density and height considerations can be limited by matters such as water/wastewater treatment, stormwater management, or municipal capacity to serve such uses i.e., can the fire department provide fire service beyond 'x' number of storeys. Being clear on the different permissions in a municipally serviced settlement area, vs. a privately serviced community should also be paramount.

Are there land use designation terminology or descriptions that would be easier to understand?

The residential I and II, as well as the mixed-use areas I and II should still allow for community specific details, i.e., the range of densities in a town of 8,000 people is very different than the range of densities in a city of 500,000 people. For example, a high-rise building in some communities may be 5-storeys, vs. a high-rise building in other communities could be 50-storeys.

D. Transitioning to a New Framework

What is your perspective on the changes being considered to transition to a standardized official plan framework?

The transition should only be required at the time of the next official plan 5 or 10 year review. Requiring upper-tiers to update first, ahead of updating lower-tiers, would be a logical transition in those areas of two-tier municipal governments.

What is a realistic implementation timeline for your municipality to update its official plan to comply with a standardized framework (e.g., structure, land use designations, page/word limits), and why? Please consider staffing, council cycles, data/mapping updates, public engagement, and statutory review requirements in your response.

See above regarding updating at the next 5 or 10 year review update.

How can the province best support municipalities in transitioning to a simplified and harmonized official plan framework?

Providing funding for such updates to municipalities, as well as limiting any new updates to (a) provincial plans, (b) the PPS, and (c) provincial legislation / regulations, such that municipalities can 'catch-up' with the pace of change over the past 6 years. Updating an official plan, only to have further changes to the *Planning Act*, associated regulations, or the PPS, can be 'defeating' to municipalities, and can lead to plans being 'out-of-date' only a short time after being approved. For those official plans or official plan amendments which require provincial decision-making, reliable and speedier decisions by the province would be beneficial. As part of this provincial role, it should be ensured that provincial ministries are sufficiently resourced to handle the review and approval duties in a timely fashion.

E. Submission of Official Plans through Online Portal

Do you support the move toward allowing submission of official plan information and documents through an online portal? Why or why not?

The County supports this approach, and encourages the use of digital only submissions.

What benefits and/or risks do you foresee from transitioning to submission through an online portal?

The County sees no risks here, assuming the portal is sufficiently equipped to handle large file sizes, number of files, and is user friendly.

Environmental Registry Posting [025-1100](#) – Consultation on Minimum Lot Sizes

Rather than providing answers to each of the discussion questions, the County provides the following broad comments on minimum lot sizes.

The County understands that the consultation only applies to urban residential land on full municipal services. That said there are still significant geographic and service/infrastructure differences across the province. For these reasons, a one-size-fits-all approach is unlikely to work here. If the province were to consider a range of standards, which consider community specific features, that may be appropriate, but a common standard for all, is unlikely to be feasible. The County would flag the amount of annual snowfall, stormwater management infrastructure, and the accessibility of transit,

as just a few areas which could necessitate a smaller or larger minimum lot size. For example, a townhouse lot in a community without transit, which receives a high volume of annual snowfall, will need to be larger than a townhouse lot in an urban community with higher order transit, which has lower amounts of snowfall. The reasons for this size differential are both for parking and snow storage reasons.

Environmental Registry Posting [025-1101](#) – Consultation on Enhanced Development Standards – Lot Level (outside of buildings)

What is your interest in and/or experience with the implementation of enhanced development standards at the lot level (outside of buildings)? For example, are you a municipal staff member, homebuilder, planner, Indigenous representative, or member of the public?

These comments are being prepared by County staff, in consultation with both County Council and municipal staff (planning and building). In order to answer the questions under this consultation, it would be helpful to have a common definition of what an enhanced development standard is. The ERO posting lists everything from permeable pavement to bicycle parking. Even in the enhanced standards listed in the posting, there is a significant difference in the applicability, and tools for applicability, across the province.

The County understands the province's desire to limit costs and uncertainties for developing in Ontario. The County shares those same goals. However, when considering 'costs' one has to consider not only the upfront costs to the builder / potential buyer, but also the long-term operating costs of both the future owners, and the impacts on infrastructure and the environment. Building an affordable home using dated technology does little to protect homeowners and the environment from operating cost increases and damages related to climate change. The province and municipalities need to strike a balance between what's required at the development or pre-development stage, vs. what may be required on future landowners to adapt to changes in both technology and our changing climate. Additionally, lot level measures reduce the burdens on existing infrastructure and reduce the demand for new physical infrastructure such as water and sewer pipes and the energy grid.

Finally, the County of Grey, alongside the counties of Dufferin and Wellington had received federal funding to create a green development standard, and associated supports for high-performance development in the region, in part to prepare for the 2030

changes with the federal building code. By working on a tri-county project, the counties had hoped to 'standardize' such requirements across our three counties to build in predictability and commonality for developers, as some developers work in all three counties. Based on the Bill 17 changes, the counties have pivoted to make this an entirely voluntary program of green development metrics. That said, it is challenging to receive federal funding for a project, be approximately halfway through the project, only to have the province 'adjust the rules' in a manner which significantly impacts the project. Again, the County wants to work with the province as a partner in achieving the province's goal related to housing and the economy. However, in recognition of our changing climate, and the 2030 federal building code changes, the County does see benefit to acting more proactively in this regard.

In your experience, are enhanced development standards applied consistently across municipalities? Please provide examples where possible.

Again, a common definition of enhanced development standards would be useful in answering such questions. County staff do not see enhanced development standards being applied in a consistent fashion across municipalities. That said, the same is true for almost all development standards i.e., there is no consistent 'residential one' zone, or no common parking standards across all municipalities, just as there is no one set of enhanced development standards.

Although not entirely consistent, the requirement for native plantings in subdivision and site plan agreements, as well as the need for bicycle parking in zoning by-laws and site plans is becoming more ubiquitous across the province.

What types of standards, should municipalities be allowed to apply outside of buildings and how do these requirements maintain the health and safety of the site if at all?

Municipalities need the ability to apply standards for site design to protect public safety and support long-term affordability and sustainability. Bicycle parking, native plantings, low impact design (LIDs) approaches to stormwater management, and bioswales should all be permissible municipal requirements either via zoning by-laws, or through site plan and subdivision agreements. Reducing gridlock and enhancing community safety are two goals which are generally shared by the province and all municipalities. Accommodating more cyclists is an easy way to both (a) reduce gridlock and (b) enhance community safety. If municipal zoning by-laws can establish car parking and truck loading standards, then the same flexibility should be established for bicycle

parking. LIDs and bioswales are also both key to preserving the natural environment and 'futureproofing' the province against the impacts of climate change.

Do you / your organization have information about the short- and long-term costs of enhanced development standards at the lot level?

For the sake of brevity, the County has not provided a detailed analysis here. However, in general terms it is more cost effective to build something right the first time, rather than to require costly retrofits after the fact. The cost to society (and municipalities) of moving large numbers of cyclists is much cheaper than moving large numbers of private automobiles. Furthermore, the costs of floodproofing up front, is more cost effective than dealing with the damage to private property and infrastructure after a flooding event. Additionally, affordability doesn't only relate to upfront capital costs, but should also bring operational costs into consideration and the costs to homeowners.

Do you have any additional comments or suggestions relating to site plan control or other related subjects?

Additional federal and provincial leadership, through research, a national building code, sharing common design / engineering best practices, and funding, would greatly assist municipalities in creating a common standard for development both at the building and site levels.

Environmental Registry Posting [025-0899](#) – Policy proposal to regulate additional sewage systems under the Building Code to support the construction of on-farm worker housing

The County supports the general intent of this change. Agriculture, including both livestock and field crops, is one of the largest drivers of the County's economy. The need to house the essential workers that are employed in agriculture is crucial for the County and the province. For the sake of brevity, the County will not provide detailed responses to all of the discussion questions in the ERO posting. Instead, the County will provide comments on the first discussion question below.

Does the proposed 10 acre (4 hectare) circular clearance from sensitive features, including property lines, greenhouses, etc. strike a reasonable balance between enabling agricultural worker housing and protecting human health, the environment, and neighbouring property values?

The County does not believe that such a circular clearance should be required. Furthermore, the ability for farmers to centralize housing in a farm building cluster should be prioritized to; (a) avoid the expansion of housing into prime farmlands, and (b) to avoid creating additional Minimum Distance Separation (MDS) setbacks to neighbouring livestock facilities. Public health and safety in siting such facilities, as well as the impact on Ontario's farmland/environment, are key considerations, and should both be given far higher credence than neighbouring property values.

Environmental Registry Posting [025-1071](#) Bill 60 – Fighting Delays, Building Faster Act, 2025 – Modern Transportation – Prohibiting Vehicle Reduction for New Bicycle Lanes

The County does not support any such prohibition that would apply to municipal infrastructure; municipalities should retain the ability to manage local municipal infrastructure to meet local municipal needs. If the province wishes to apply such standards to provincial highways, then the County would ask that they not apply to sections of provincial highways in settlement areas, where there is a Connecting Link agreement in place.

In the ERO posting it states the following:

“The proposed changes are intended to keep people and goods moving by creating more capacity on roads for vehicles and drivers. Traffic and congestion are a major source of air pollution especially in urban areas.”

The County agrees with the stated goal of keeping people and goods moving and reducing traffic, congestion, and air pollution. Having the ability for local municipalities to deliver roads and transportation infrastructure that is responsive to local needs is critical to enable municipalities to manage road networks to keep people and goods moving. This can, at the right times and in the right places, as determined by local needs, include a safe and reliable cycle lane network. These have been proven to be both an affordable and effective way to reduce gridlock, keep people moving, and reduce pollution. Bicycle lanes, alongside investments in public transit, pedestrian connectivity,

and motor vehicle (cars / trucks) infrastructure are all key building blocks to an effective transportation network. Some of the world's least congested, and happiest cities are those that have provided significant public investment in cycling infrastructure alongside transit and other modes of transportation.

Finally, staff are unclear on the below wording in the ERO posting:

“Schedule 5 of Bill 60 proposes amendments to the Highway Traffic Act (HTA) that would prohibit municipalities from reducing motor vehicle lanes when installing, implementing or marking new bicycle lanes.”

MTO Book 18 defines bicycle lanes, bicycle facilities and shared cycling facilities; clarity is sought to confirm that the amendments proposed in Schedule 5 are limited only to bicycle lanes as defined by the MTO.

Further, the County requests further clarity in this amendment; does the amendment above only apply to the total number of motor vehicle lanes, or does it apply to the width of motor vehicle lanes? i.e., if this Highway Traffic Act change were to be implemented, could a municipality reduce motor vehicle lane widths, provided it is not reducing the total number of motor vehicle lanes? The County does not support either approach, but clarity is required on whether it applies to one or both of these scenarios.

Environmental Registry Posting [025-1140](#) Bill 60 – Fighting Delays, Building Faster Act, 2025 – Supporting the Harmonization of Municipal Road Construction Standards

Similar to some of the County's comments above on standardizing official plans, and minimum lot size standards, a one-size-fits-all approach would not work for road standards. The County operates using existing engineering standards, the Ontario Provincial Standard Specification (OPSS) and the Ontario Provincial Standard Drawings (OPSD) for its road contracts. These existing standards and specifications help to ensure consistency across projects, yet they allow for professional engineers to be able to ensure that roads are designed for the environment that they are in, respecting the local topography, traffic volumes, underlying soils and bedrock and drainage patterns and needs.

While the County could see merit in the province potentially consulting with municipalities on co-developing a series of road best practices, e.g., from a low-traffic rural gravel road, to a fully urbanized cross section for a high-traffic road, the County would note that with the province's diverse geography, climate, precipitation levels, and

differing soil / drainage levels, it will be difficult to create such standards that meet the needs of all municipalities. Even across Grey County, at the Municipal and County levels there is a wide array of standards across the rural and urban areas, including privately developed condominium roads. One of the risks associated with a common standard is that it may mean some roads become 'over-built' while others may be 'under-built' in a manner which could be costly to municipalities and taxpayers.

The County also has concerns over how such a standard could impact liability and the application of minimum maintenance standards.

Bill 60 also indicates that further regulations would follow with respect to standard contracts, an exemption of process, and reporting requirements. The County is not supportive of these approaches which appear to be adding red tape and bureaucracy. The County has standard forms of contracts used across contracting projects including roads construction and has formed good relationships with contractors in meeting these expectations. As noted, the County is not supportive of further standardization beyond the tools already in place through OPSS; further standardization would demand exemptions to suit local needs, thereby creating the need for a new process and management of this. Likewise, a new reporting structure on the use of road construction is a new process that would be required. This is creating red tape where none currently exists.

Ultimately, the County believes that the existing tools and frameworks largely meet the intent of harmonization. There may be merit to further engagement on best practices, but the County expresses concern that the proposed changes add red tape, increase bureaucracy, and will cause delays to roads infrastructure projects.

Ontario Regulatory Registry Postings [25-MAG017](#), [25-MMAH024](#), [25-MAG019](#), [25-MAG016](#), and [25-MAG025](#) – Fighting Delays at the Landlord and Tenant Board

Reduce the time the parties have to request a review from 30 to 15 days

The County has concerns that this change may lead to an increase in appeals and require more landlords to restart the process when minor errors are not identified immediately. Additional appeals and restarts would place further strain on an already overburdened Landlord and Tenant Board (LTB) system. Rural areas such as Grey County face unique challenges, including a higher likelihood of mail delays, which may further complicate shortened timelines. Reducing the time available to review an order

would also place added pressure on community legal clinics, without providing the additional resources or funding needed to manage this increased workload.

Shorten the Rent Arrears Eviction Notice Period

The lack of availability of sheriffs, particularly in rural Ontario, is a bigger impediment to the system, than the shortening of the eviction notice period for landlords. The ability to execute an order via a sheriff is crucial to the functioning of the system. The County also advocates for a standardized timeframe for orders to be written and dispersed. Current internal LTB processes see some orders taking upwards of six months to be written and dispersed. These modifications will bring more significant reductions to eviction timeframes than reducing the rent arrears eviction notice period. Further, by reducing the period from 14 days to 7 days, additional burden is placed on local legal clinics and rent banks with no additional support to meet demand.

Remove Ability to Raise New Issues on The Day of a Rent Arrears Hearing

The County is concerned that this change could place additional strain on some of the most vulnerably housed individuals across the province and may unintentionally create a two-tier system rather than supporting a level playing field. County staff recommend that the same standards be applied to raising maintenance concerns at non-payment hearings as are required at hearings for behavioural matters, specifically, that all parties be required to bring forward their issues and submit supporting evidence at least seven days in advance.

Compensation Requirements for Landlord's Own Use Evictions

The County has concerns with these proposed changes. While the County recognizes the importance of allowing a landlord to reclaim a rental unit for their own use, the impact on renters, who may face eviction through no fault of their own, and their ability to secure new housing in a low-vacancy market can be significant. If own-use evictions are permitted with shorter notice periods, renters should be entitled to appropriate compensation to help mitigate this hardship.

Although the County, as a housing provider, does not rely on own-use evictions, increased displacement from the private rental sector without compensation may put additional pressure on the County's Housing and Social Services programs, staff, and budgets, as well as other provincially funded supports.

Tribunals Ontario to explore options for increasing access to final Landlord and Tenant Board (LTB) decisions and orders

The County supports any initiative that improves the accessibility of decisions and orders for individuals who need them. As LTB decisions and orders are public documents, it is essential that they be easy to access and available through efficient, user-friendly means.

Postponement of an Eviction Order

The County agrees that the current system lacks consistency and transparency. However, any changes to this process should only be done after deep and meaningful consultation with landlord groups, tenant groups, and municipalities to ensure all parties rights are met, that decisions are fair and respect human rights considerations while balancing the rights of landlords.

Increase enforcement resources to reduce wait times to enforce LTB eviction orders once filed

The County supports this change and strongly recommends establishing a permanent sheriff position in Grey County. Over the past three to four years, the County has frequently gone without a sheriff for extended periods. During these gaps, neighboring regions must reassign their staff to cover, resulting in significant and unacceptable delays in executing orders.

Simplified Language in LTB Documents

The County would support this change but would also note that recent changes to the LTB website are very confusing, so a simplified and more accessible website would be useful there as well.

Setting Aside an Eviction Order

The County agrees the current system does not provide consistent responses to set aside requests. Tenants can request multiple set asides, sometimes causing delays in eviction by months. Clarity and consistency would be appreciated here, but only after deep consultation with landlord groups, tenant groups, and municipalities to ensure all parties rights are protected. The County would advocate that one set aside be allowed for any file unless evidence is provided to support additional claims that warrant consideration of a second set aside.

Lease Agreement Expiry

The County does not support this change and has serious concerns with the potential impact to renters, should this change proceed. Although the province has announced via social media that this consultation is not proceeding, the County would like to see the province more formally rescind this consultation in its entirety.

Ontario Regulatory Registry [25-MMAH030](#) – Implementing Reforms to the Development Charges Framework

Merge water supply services and wastewater services for the purpose of DC credits

Grey County does not manage any water or wastewater systems. On behalf of member municipalities who do manage such services, the County would note that the merging of such services for DC credits could lead to issues for municipalities. More specifically a proponent would be eligible for a credit for both services, if the capital costs / works have been provided for either service. This change could impact municipal revenue on the water or wastewater service not provided by the proponent.

Make benefit to existing allocations more transparent in DC background studies

The County supports the intent of this change, i.e., to provide more transparency on the benefits to existing development. This will require additional effort on behalf of municipalities. The County notes that while some projects will have a standard methodology, there could also be situations where the 'methodology' is very specific to an individual project.

Details on land acquisition costs to be set out for each service in DC background studies

This change, partnered with the changes proposed to the DC Act via posting 25-MMAH018, may result in less DC revenue to fund future capital projects and could add additional administrative burden on municipalities to separate land costs from project costs. Restricting forecast periods on some services also seems contrary to earlier DC Act changes which removed the 10-year forecast period restriction for services other than transit.

Make information in financial statements relating to DCs more transparent and easily accessible

The County supports the intent of this change, but notes that it will create additional administrative burden on municipal staff in reporting via the annual treasurer's statement.

Ontario Regulatory Registry [25-MMAH018](#) Changes to the Development Charges Act, 1997 to Enhance Standardization and Streamlining of the Development Charge (DC) Framework

1. The government has heard that land values are a key cost component of the DCs on new housing. Greater transparency is needed to ensure that land costs in a DC rate are reasonable.

See above comments land acquisition costs on 25-MMAH030.

2. Local service policies (LSPs) are currently not a statutory requirement for municipalities. Furthermore, the government has heard that it is often not clear which costs are DC-eligible and which costs are local costs, which can result in development delays.

This proposed change will require municipalities to establish a Local Service Policy, if one is not in place within 18 months of the legislation taking effect. The County supports the intent of this policy, but recommends that the transition period take effect at the time of the preparation of the next DC background study, rather than within 18 months of the legislation taking effect.

3. The government has heard that information on municipal collection and use of DCs is not always readily accessible on municipal websites and can be difficult to obtain.

The County supports the intent of these changes, but would request some leniency where there are extenuating circumstances. Many municipalities are short-staffed in their Finance departments, and as such, depending on staffing or other factors there may be individual years where such deadlines are difficult to meet.

Overall Pace of Change and the Need for the System to Adjust

As noted above, the County wants to be an active partner with the province in achieving our collective goals. The provincial government has been very clear on a number of provincial priorities related to both housing and the economy. More expeditious approvals, transparent processes and fees/charges, improvements to infrastructure, and clear policy, are all objectives shared at both the provincial and municipal levels.

The County would, however, note that both the speed and frequency of change related to planning, building, and development charges has made it very difficult to 'keep up' and adjust to each change. Many of the legislative and regulatory changes over the past several years have resulted in significant changes to municipal processes and policies, at both great time and expense to municipalities. While several changes have been 'for the better', it's difficult to achieve speedier approvals when dealing with an ever-changing legislative and regulatory framework (i.e., still transforming processes from the previous change when a new change comes along). The County recommends a period of stasis on these portfolios to allow municipalities time to adapt both their policies and processes to these changes. From there, evaluation on the efficacy of the changes could be assessed, before moving forward with any further changes.

Grey County appreciates the ability to provide comments on these matters. Please do not hesitate to contact me should you wish to discuss any of the County's comments further, or should you require input on any additional matters.

Yours truly,



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