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December 8, 2022

The Honourable Steve Clark
Minister of Municipal Affairs and Housing
777 Bay Street, 17th Floor
Toronto, ON M7A 2J3

Dear Minister Clark,

Re: Bill 23 – More Homes Built Faster Act, 2022

The Council of the Town of Lincoln received a staff report No. AD-17-22 regarding Bill 23, on December 5, 2022. The Report highlights information, concerns and perspectives regarding the significant changes that were just made to local planning responsibilities across Ontario. Council also passed a motion directing staff to write a letter outlining their concerns to your ministry and the Government of Ontario.

We recognize that there is a shortage of housing, particularly affordable housing, in Ontario and across Ontario. Lincoln as a growth center in Niagara understands the challenges well, and while we feel we are meeting the governments goals and objectives, we have some significant concerns about the legislation and expect there will be further refinement, supplemental implementation guidance, and support for municipalities.

Accelerating the construction of housing, particularly affordable housing units, is laudable and something the Town of Lincoln supports. As a municipality, we can align with the policies, goals and objectives of the Provincial Government while continuing to pursue our efforts to maintain a sense of place in a welcoming, diverse, and livable community.

However, we require the ability to manage the growth that is taking place in our municipality and Bill 23 poses significant challenges to our efforts. Our Council and residents are unhappy about the elimination of various controls and are concerned about the costs being downloaded to the municipality. Staff have taken care to review Bill 23 and outline how the new legislation may affect our decision-making, funding models and collaboration with other levels of government, especially that with the Niagara Region.

Changes to the Development Charges Act and the Planning Act may inevitably result in loss of revenues that will need to be recovered – and will very likely result in construction delays to support growth and pay for community amenities. It is our expectation that if

the provincial changes result in municipalities forgoing much needed revenue as they might otherwise receive, there should be a compensatory investment in municipal projects to make them whole. This will be essential for municipalities like Lincoln, who are making every attempt to address the infrastructure needs across our municipality. We implore the government to establish a program to address infrastructure needs and furthermore, that this investment for municipalities should not result in new taxation for the people of Ontario, who already face significant tax burdens.

In addition, the municipality is concerned about potential loss of employment lands, which Bill 23 has recognized as potential lands that can be shifted to residential growth opportunities. In order to support our tax base, provide jobs and support growth, these employment lands are critical. While Lincoln does not have a lot of underdeveloped employment lands, our hope is that your ministry can recognize the importance of lands that create jobs to help ensure our non-residential tax base grows. In fact, Lincoln would appreciate additional employment land opportunities through whatever means the government has, including an examination of the Town's urban boundaries.

The Town of Lincoln strives to promote economic activity and growth within our municipality, and this is evident with record building permits from 2019 to 2021 where we have had an average of approximately 350 housing starts per year with an average construction value of \$98 million annually. This growth has consisted of a variety of housing types. The Town of Lincoln has worked collaboratively with developers and builders to provide the types of housing needed in our municipality, preserve the character of existing neighbourhoods and protect our natural heritage. For example, we are currently working with a developer on the transfer to the Town of nearly 14 acres of protected lands and waterfront; and in the past year finalized a similar arrangement to create a waterfront park in another part of our municipality. These transactions require sound working relationships, which the Town has worked very diligently to create with our developers and builders, as well as funding to complete acquisition of necessary lands in order to make the parks viable.

Council has consistently upheld their responsibility to make decisions that represent the overall best interest of the town, region and province. We recently supported the new Official Plan of Niagara Region which included growth targets specific to each lower tier municipality. This support included dialogue between Town and Regional staff that resulted in a significant increase in the growth allocation to the Town to account for market trends and Provincial direction regarding residential development. This reflects the Town's willingness to grow and our proactive, strategic planning approach that has resulted in identification of areas in the Town to best accommodate forecasted growth and infrastructure needs. This Regional Official Plan was recently approved by your Ministry.

Over the past few years, the Town has proactively planned for significant residential growth which is integral to the goal of building complete communities. Specifically, we have identified strategic growth areas with building heights and densities that are appropriate to provide a range of housing options, while also providing various supporting

land uses. This has occurred within two large Secondary Plans, the unit contributions of which will satisfy current growth targets. Within one of these, we have worked towards creating significant development opportunity surrounding a potential GO Transit Station. In addition, we have developed a strategic vision and streetscape master plan for the associated primary road corridors that take into account re-development and infill while providing effective and appropriate transition policies.

We are committed to working with you and other provincial Ministers to exhibit what Lincoln has and showcase what is happening in our municipality, how we are a valuable partner in helping the province achieve success, that we are aligned with the Government's long-term objectives in many respects and that prosperity locally translates into prosperity provincially. However, we need you to understand how your Bill is going to impact our common goals and the wellbeing of our community. It is our expectation that you will take the necessary steps to refine Bill 23 to meet the needs of all Ontarians and continue to consult and build relationships with your municipal stakeholders.

In closing, through our Affordable Housing Committee, we have identified housing needs in our municipality, changed policies to facilitate more housing construction and worked with Niagara Region to identify further attainable housing opportunities. We are meeting the provinces goals and targets and therefore ask that our comments and concerns be taken within that context.

Please accept the comments in this letter and in Town of Lincoln Report AD-17-22 for what they are intended to be - constructive comments designed to assist the Government to meet its housing agenda without putting the character of our communities at risk.

We look forward to continuing to work with you on this and other matters of importance to the residents of Ontario.

Sincerely,



Sandra Easton
Mayor
Town of Lincoln



Michael Kirkopoulos
Chief Administrative Officer
Town of Lincoln



Matt Bruder
Director of Planning & Development
Town of Lincoln