



## The Corporation of the Township of Huron-Kinloss

21 Queen Street  
P.O. Box 130  
Ripley, Ontario  
N0G 2R0

519-395-3735  
Toll Free: 844-395-3735  
Fax: 519-395-4107

[bpollock@huronkinloss.com](mailto:bpollock@huronkinloss.com)  
[www.huronkinloss.com](http://www.huronkinloss.com)

**Date:** June 11, 2025

**Subject:** *Comments on Bill: 17 Protect Ontario By Building Faster and Smarter Act, 2025*

The Township of Huron-Kinloss respectfully submits these comments for the Ministry's consideration. The Township is thankful to be apart of the consultation process, and we support continued efforts to streamline development processes.

### **Building Code Act- Create a Regulation-Making authority to Specify What Constitutes a "Local Services"**

The Township is concerned that proposed changes may cause further delays when negotiating development agreements. This is due to the possibility that by including more local services in the agreements it may result in higher upfront costs and longer negotiations, both of which potentially delay projects.

### **Development Charges Act- Expand the Development Charge Deferral to Non-Rental Residential and Development**

The Township is concerned with expanding the deferral of Development Charges from the building permit stage to when occupancy is obtained. This change may introduce several administrative challenges in collecting Development Charges. Deferring Development Charge payments until occupancy will place an additional administrative burden onto the Township. Moreover, both Bruce County and the Municipality of Huron-Kinloss currently charge Development Charges with the Municipality responsible for collection. In addition, there are no requirements in the Building Code for Development Charges to be paid as a condition of occupancy. This may lead to difficulties in collecting the Development Charge. The Township is seeking further clarification on how this policy change will be implemented at both the county and municipal level and how it will impact the ability for Municipalities to collect development charges upfront as has been the case in Huron-Kinloss.

## **Exemption for long-term care home development**

There is a concern that in exempting long-term care homes from Development Charges will result in a higher financial burden for the Township. Long-term care homes can be heavy users of infrastructure. Staff are seeking additional clarification if the province plans to provide additional funding required for growth related infrastructure that would have otherwise been collected by development charges.

## **Planning Act/ City of Toronto Act**

Minor Variances (As of Right Variation from Setback Requirements)

The proposed regulation would have little impact on the volume of planning applications received in the municipality. Variances of less than 10% are extremely uncommon. The proposed changes will result in a high degree of administrative responsibility.

If the province implements variances as-of-right, we suggest certain considerations be made

- That the regulation may be broadly applied to all residential lots within settlement areas, not only those that are fully serviced.
- This regulation should not reduce setbacks to shorelines and hazard areas when in doing so could compromise environmental protections
- Where the municipality is limited with its firefighting capacity. Consideration will have to be given to maximum height and setback thresholds in respect to firefighting.
- We advise against permitting as of right lot coverage regulations, in consideration with stormwater drainage management.
- Staff are seeking additional clarification as to how current legal non-conforming uses will be regulated under the Act.
- Additional clarification is required for setbacks that would be included in the regulation; for example could it be interpreted to include:
  - Permitted encroachments into required yard setbacks (chimneys, eaves, decks, etc)
  - Lot line setbacks for Sight Triangles
  - Lot line setbacks to Arterial roads setbacks
  - Lot line setbacks adjacent to provincial highways

- Setbacks from driveways or parking areas to lot lines
- Primary vs accessory buildings o Buildings with one or more residential units or any buildings on lands that permit residential uses as a primary use
- Setbacks from lot lines between urban residential land and industrial or other incompatible uses in accordance with provincial guidelines
- Safety factors to maintain separation distance for buildings under 15 square metres that are not regulated by the OBC
- The regulation should only apply to zoning by-laws that were passed prior to the enactment. Municipalities should be empowered to amend their by-law to reflect the new regulations.

To summarize, the Township urges to the Ministry to further consider this regulation. We recommend that the Ministry adopts a similar protocol to that of consents, wherein undisputed consents are streamlined through the process to allow for greater efficiency.

### **Streamline Planning Approval for Schools**

The Township is requesting that the Ministry consider including private schools into the regulation, to facilitate development regardless of public or private.

The Township is appreciative of the Province's ongoing efforts to address Ontario's critical housing and infrastructure needs. We recognize how important it is to create a more efficient development system that addresses these needs. We encourage the Ministry to continue to work closely with municipalities through consultation to ensure sustainable and effective implementation.

Thank you for your time and consideration.

Township of Huron-Kinloss