



August 20, 2019

Re: Proposed changes to O. Reg. 82/98 under the Development Charges Act related to Schedule 3 of Bill 108 - More Homes, More Choice Act, 2019

CAPREIT Limited Partnership ("CAPREIT") is the largest residential landlord in Canada, the Netherlands and Ireland. CAPREIT is the owner / operator of approximately 61,000 residential units, including 49,500 residential suites and 72 manufactured home communities comprising 11,677 land lease sites.

In recent years, CAPREIT has advanced a development program aimed at adding more rental housing units to its portfolio of properties, where appropriate, while facilitating the improvement of these properties for both existing and future residents.

The majority of CAPREIT's landholdings are located within Ontario, as such, CAPREIT is actively monitoring the policy changes proposed to O. Reg. 82/98 under the Development Charges Act related to Schedule 3 of Bill 108.

CAPREIT offers the following comments:

1. Part II Subsection 2(3)(b) states:

"The creation of additional dwelling units in prescribed classes of residential buildings and ancillary structures does not trigger a development charge."

Recommendation: The Province review applicability of this policy to new and existing purpose-built rental properties ripe with infill and/or redevelopment opportunity as an "other residential building".

2. Part II Subsection 26.1(2)1. defines and restricts rental housing development as:

"Rental housing development that is not non-profit housing development referred to in paragraph 5."

Recommendation: The definition of rental housing development be expanded to include purpose built rental housing development.

3. Part III Section 52(3.1) reads:

"Despite subsections (2) and (3), an amount that is payable under subsection (1) in respect of any part of a development that consists of a type of development set out in subsection 26.1 (2) is payable in accordance with the following provisions, with necessary modifications:

1. Clause 26.1 (3) (a) or (b), as applicable.
2. Subsections 26.1 (5), (6) and (9)."

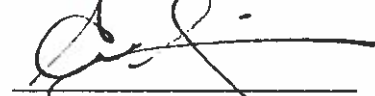
Recommendation: The notification period referenced in Subsection 26.1(5) be increased from 5 days, explicitly noted on an occupancy permit application and reflected in the *Building Code Act*.

Additionally, CAPREIT commends the proposed deferral of development charges payment until occupancy for rental housing development, provided the definition is expanded to include purpose-built rental housing development, as per comment #2 above.

We look forward to further refinements and continued involvement in the development of the policies.

Sincerely,

CAPREIT LIMITED PARTNERSHIP



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Development Manager