



LONDON DEVELOPMENT INSTITUTE

August 13, 2019

Ministry of Municipal Affairs and Housing
Municipal Finance Policy Branch
13th Floor, 777 Bay St.
Toronto, ON
M5G 2E5
Canada

RE: Regulation Changes Under the Planning Act to prescribe matters related to community benefits authority.

On behalf of the London Development Institute I am pleased to provide the following comments regarding the proposed regulation changes to the Planning Act to improve housing availability in Ontario.

The London Development Institute (LDI) is a member-based organization representing most land developers in the London area. LDI has been the leading voice on development issues in our City for more than 40 years. Our goal, working with our partners in local government and the community, is to build a better London.

The proposed regulation changes under the Planning Act, to ensure the transparency of both the community benefits program and the cash-in-lieu for parkland through a public reporting system, are supported by LDI. LDI is supportive of the implementation of the similar reporting requirements used for development charges.

LDI also supports the exemptions from community benefits charges for private and public housing developments that have a direct impact on the quality of life in our City.

LDI also supports the community benefit costs formula that uses land value, pre-building permit, to determine the capital infrastructure for community service costs. We also welcome the appraisal system and the mechanism to settle disputes between the City and the developer as to the value of the land.

LDI agrees with providing consistency between the Development Charges Act and the Community Benefits program. We appreciate the exclusions from DC charges will be the same in the Community Benefits program.

Finally, we are very supportive of the single application approach under the community planning permit system. We also recognize overlapping programs such the community benefits program and the community planning permit process could result in a municipality charging twice for the same community infrastructure. Our recommendation is to include language in the legislation that prohibits a charge, that is applicable to a development, to be charged more than once. The charges applicable to each program must be made public in a transparent and clear manner.



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If you have any questions or wish to consult with the London Development Institute in further detail on any of these issues raised, please do not hesitate to contact us. We are more than willing to meet with the Minister, his staff or a Standing Committee of the Government of Ontario.

Thank you for your consideration.

A handwritten signature in blue ink, appearing to read 'Mike Wallace', is written in a cursive style.

Mike Wallace
Executive Director
London Development Institute