



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 Development Charges Act including Reg.82/98 related to Schedule 3 of Bill 108.

On behalf of the London Development Institute I am pleased to provide the following comments regarding the proposed regulation changes to the Development Charges 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 Development Charges Act including matters related O. Reg. 82/98 to Schedule 3 of Bill 108 are supported by LDI. LDI is supportive of any changes that will assist in the development of purpose-built rental housing. The streamlining of the planning approval process and the development charge deferral program will assist in easing the capital-intensive requirements of developing rental housing in Ontario.

LDI also welcomes the freeze of development charges at the time of site plan submission or the date of the zoning application was approved. This change will provide much needed certainty in the process from a financial perspective. The freeze in development charges will provide an incentive for municipalities to process applications in timely manner. We also support the reduced development charges for the creation of secondary units. This change will make the addition of a secondary units much more affordable thus encouraging their development. This will directly affect the affordable housing crisis in Ontario.

Finally, LDI would like to emphasize the prescribed interest rates that a municipality will be eligible to apply to the DC deferral must not be at a level that would defeat the propose of the legislation. If a municipality charges market or above rates against the DC deferral this would likely defeat the incentive to use this new tool to encourage purpose built rental housing.

562 Wellington St., Suite 203, London, Ontario, N6A 3R5

tel. (519) 642-4331

www.londondev.ca

londondev@rogers.com



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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