



County of Simcoe
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August 21, 2019

John Ballantine, Manager
Municipal Finance Policy Branch
Ministry of Municipal Affairs and Housing
777 Bay Street, Suite 425 (13th Floor)
Toronto, ON, M5G 2E5

Dear Sirs:

**RE: County of Simcoe comments on the proposed new regulation pertaining to the community benefits authority under the Planning Act
ERO number 019-0183**

The County has appreciated the opportunity to provide comments related to Bill 108 More Homes, More Choices Act. The County provided written comments for Schedule 12 of the Act through the Environmental Registry of Ontario on May 29, 2019.

Thank you for the opportunity to provide comments on the proposed new regulation for provisions in Schedule 12 that pertain to the community benefits authority under the Planning Act.

The County of Simcoe is supportive of the Province's desire to address the affordability of housing and increase the housing supply as well as making the costs of development more predictable.

Through Bill 108, mandatory community benefits exemptions for long-term care homes, retirement homes and non-profit housing would help reduce the cost to build certain types of high priority development. The County is also supportive of the continued exemptions of the facilities, services or matters that are consistent with the existing ineligible services list currently found under the *Development Charges Act*.

Growth-related capital infrastructure and 'soft services' such as libraries, park amenities, recreation facilities, and other local infrastructure are critical to developing complete communities and providing affordable, accessible services and infrastructure to our communities. The community benefits formula described in the proposed regulation identifies that the formula would involve applying a range of prescribed percentages to the value of the development land on the day before the building permit is issued. Prudent financial planning relies on stable and secure funding sources and the County is concerned that collecting community benefit charges based on the value of development sites which can vary from site to site and rise and fall with market conditions, rather than clear cut unit count and building areas would make municipal financial planning efforts less predictable.

The County also has concerns with the financial impact of Bill 108, which cannot be fully assessed at this time as a prescribed percentage that would be applied through the community benefits formula has not been identified. The County looks forward to further consultation on the details of a proposed formula.

The County is comprised of sixteen member municipalities and land value varies throughout individual municipalities. The County is concerned that there could be inequities in the revenue generated and the

soft services that could be afforded between municipalities with varying land values unless the range of prescribed percentages can account for differences in land values across the province.

The County is supportive of a range of percentages to take into account the varying value of land and ensure that municipal revenues historically collected from DCs for soft services, parkland dedication and density bonusing be maintained.

In order to ensure that the community benefit charge formula accounts for varying land values and achieved revenue neutrality, the County would be supportive of regulations that:

- Establish separate percentages for residential and non-residential development and distinguish between high density residential and other residential built forms.
- Prescribe revenue caps and permit municipalities to impose different charges by types of development provided they do not exceed their cap.
- Where mixed use development is proposed, allowing a municipality to establish rules where land values can be assigned to specific portions of a site based on the type of development.
- Permit municipalities to establish rules to determine the land area to which the charges are to apply and when a community benefit charge is payable.
- Include provisions for monitoring revenues and updating the applicable prescribed percentages.

The above provides an overview of the comments/concerns that the County of Simcoe has with the proposed regulation related to the new community benefits authority.

Thank you for the opportunity to provide feedback on the proposed changes. If you have any questions or require further information with respect to this correspondence, please do not hesitate to contact the undersigned.

Sincerely,
The Corporation of the County of Simcoe



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CC: Debbie Korolnek, General Manager, Engineering, Planning and Environment – County of Simcoe
