



OAKVILLE

REPORT

COUNCIL MEETING ADDENDUM

MEETING DATE: MARCH 23, 2020

FROM: Finance Department

DATE: March 18, 2020

SUBJECT: **Bill 108 - More Homes More Choice Act - Update**

LOCATION: Town wide

WARD: Town wide

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RECOMMENDATION:

1. That the report titled "Bill 108 - *More Homes, More Choice Act - Update*", dated March 18, 2020, be received.
2. That the use of the prime lending rate of the town's financial institution as the interest rate for the development charge rate freeze and deferrals as permitted in the *Development Charges Act, 1997* be approved.
3. That staff be delegated authority to enter into agreements confirming terms of payment or advancing the timing of payments under section 27 of the *Development Charges Act, 1997*, for developments subject to development charge deferrals to the satisfaction of the Treasurer and Town Solicitor.
4. That staff be authorized to make submission to the Province in response to this and any other proposals related to Bill 108 should the Province's comment deadline preclude a prior report to Council.
5. That the comments within the report titled "Bill 108 - *More Homes, More Choice Act - Update*", dated March 18, 2020, related to the proposed regulatory matters pertaining to the community benefits charge authority be endorsed as the Town of Oakville's response to the Environmental Registry of Ontario (ERO) Proposal No. 019-1406, and submitted to the Ministry of Municipal Affairs and Housing prior to the March 30, 2020 commenting deadline.
6. That the Province be requested to consult with municipalities prior to issuing final regulations pertaining to the community benefits charge authority.

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7. That the Town Clerk forward a link to the report titled “Bill 108 - *More Homes, More Choice Act* - Update,” dated March 18, 2020, along with the Council resolution, to Halton’s Members of Provincial Parliament (MPPs), Halton Region, the City of Burlington, the Town of Halton Hills, the Town of Milton, the Association of Municipalities of Ontario (AMO), and the Association of Municipal Clerks and Treasurers of Ontario (AMCTO) for information.

KEY FACTS:

The following are key points for consideration with respect to this report:

- On June 6, 2019, Bill 108 – *More Homes, More Choice Act, 2019* received Royal Assent. It amends 13 different statutes (e.g. *Building Code Act; Development Charges Act, 1997; Local Planning Appeal Tribunal Act, 2017; Ontario Heritage Act; Planning Act*) and will impact Council’s ability to manage and finance the growth-related needs of the town and provide complete communities.
- All changes to the *Planning Act*, except for those related to community benefits charge authority, came into force on September 3, 2019, as specified by proclamation.
- In previous reports, the town – and other municipalities – raised concerns about Bill 108 and the first batch of proposed implementing regulations, particularly with respect to the uncertain financial implications. The Minister of Municipal Affairs and Housing has stated that the changes are to be revenue neutral for municipalities.
- Parts of Schedule 3 of the *More Homes, More Choice Act* were proclaimed on January 1, 2020 relating to the *Development Charges Act*. The now proclaimed changes impact development charge rates and the timing of collection of development charges for certain types of development.
- On February 28, 2020 the Ministry of Municipal Affairs and Housing released a proposal describing proposed regulatory matters pertaining to the new community benefits charge authority under the *Planning Act, Development Charges Act*, and the *Building Code Act* on the Environmental Registry of Ontario. The comment period for ERO No. 019-1406 (Appendix A) expires on March 30, 2020, providing the first, albeit brief, opportunity for municipalities to provide feedback on the community benefits charge authority.
- The province has maintained park development, recreation, and libraries as development charge eligible services and removed the current statutory 10% deduction. Staff commend the Province on this measure, as there is more certainty that projects required to maintain service levels as the town grows

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will be delivered in a timely manner while ensuring that growth pays for growth to the greatest extent possible.

- Staff are unable to comment on the full impact of the proposed regulatory matters as a number of details remain unspecified. Further, an extensive amount of work is required to determine the reasonability of the maximum percentage of land value cap on a potential community benefits charge, and how that may impact the ability of the town to meet growth needs and provide complete communities. Additional consultation with municipalities is needed in order to determine the feasibility of a singular cap (or multiple caps) that will allow for municipalities to meet service needs.
- It is staff's intent that the comments in this report related to ERO No. 019-1406 (Appendix A) be submitted to the Ministry of Municipal Affairs and Housing as the town's response together with Council's endorsement.
- It is not known yet when the remaining draft regulations related to Bill 108 will be made available, the extent of consultation to be undertaken, or a timeline for enactment.

BACKGROUND:

On May 2, 2019, the Ministry of Municipal Affairs and Housing released the "More Homes, More Choice: Ontario's Housing Supply Action Plan". As part of the Action Plan, the Province also tabled Bill 108, which proposed numerous changes to 13 different statutes that impact how and where development occurs in Ontario. Separate schedules to the bill describe the changes to each of the affected statutes and when they will come into force (e.g., Schedule 3, *Development Charges Act, 1997* (DCA); and, Schedule 12, *Planning Act*).

At its meeting on May 27, 2019, Council endorsed a staff report as the town's submissions in response to Bill 108, which raised concern about the unknown financial impact to the town among other things. On June 6, 2019, Bill 108 received Royal Assent and was largely unchanged from the First Reading version of the Bill. As such, Bill 108 is now an Act – the *More Homes, More Choice Act, 2019*.

On June 21, 2019, the Province released descriptions of an initial batch of regulations related to Bill 108's changes to the DCA, the *Local Planning Appeal Tribunal Act*, and the *Planning Act*. In response, on August 6, 2019, Planning and Development Council endorsed a report titled, "Bill 108, *More Homes, More Choice Act – Proposed Regulations*", which was submitted to the Province, along with the Council resolution.

On December 10, 2019, Bill 138, the *Plan to Build Ontario Together Act*, received Royal Assent, amending some of the changes to the DCA and the *Planning Act*

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made through Bill 108, and providing a process to appeal a Community Benefits Charge (CBC) By-law to the Local Planning Appeal Tribunal (LPAT).

On January 1, 2020, parts of Schedule 3 to the *More Homes, More Choice Act* were proclaimed, which impact development charge rates and the timing of the collection of development charges for certain types of development. This report summarizes these changes and recommends an interest rate to be used as permitted by the DCA.

On February 28, 2020, the Ministry of Municipal Affairs and Housing released a description of proposed regulatory matters pertaining to the community benefits charge authority under the *Planning Act*, *Development Charges Act*, and the *Building Code Act* on the Environmental Registry of Ontario (ERO). The public consultation period for ERO No. 019-1406 ends on March 30, 2020. In order to meet the commenting deadline, staff will provide a submission to the Ministry of Municipal Affairs and Housing consistent with the comments in this report.

COMMENT/OPTIONS:

As noted in this and previous reports to Council, Bill 108 will impact the way Council manages and finances the growth-related needs of the town and provides complete communities.

The amendments that Bill 108 makes to the *Development Charges Act* (DCA), *Local Planning Appeal Tribunal Act*, *Ontario Heritage Act*, and *Planning Act* (among others) are set out in separate schedules. Each schedule to Bill 108 describes when it will come into force. Some provisions came into force when the bill received Royal Assent, others will come into force on a specified date and the majority will come into force on a day to be proclaimed by the Lieutenant Governor (on the advice of Cabinet) when the necessary implementing regulations are established. This report addresses changes related to Schedule 3 (changes to the Development Charges Act) and Schedule 12 (changes to the Planning Act)

Legislative Changes to the Development Charges Act

On December 19, 2019 the town received a letter from the Ministry of Municipal Affairs and Housing (Appendix B) confirming changes effective January 1, 2020 to the DCA made by the More Homes, More Choice Act. The changes to the DCA that are now in force are outlined below.

Timing of Development Charge Collection

As of January 1, 2020 the following development types will be able to defer payment of development charges (DCs) until occupancy, rather than at building permit:

- Rental housing development (that is not non-profit housing)

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- Institutional development; and
- Non-profit housing development

Further, these development types will pay DCs in annual installments. Rental housing and institutional developments will pay DCs in six installments over a five year period, and non-profit housing developments will pay in twenty-one installments over a twenty year period. These development types are defined in more detail in Section 11.1 of O. Reg. 454/19 (Appendix C). In the event that DCs are not paid when due, the legislation allows for any unpaid DCs including interest to be added to the tax roll and collected in the same manner as taxes. In the initial batch of proposed regulations, industrial and commercial development types were also eligible for deferrals. These types were removed through Bill 138, which has reduced the potential impact significantly. Deferrals result in the delay of DC collections which could result in financial risk associated with debt financing.

Staff proposes to enter into agreements with developers as a tool to confirm and maintain a record of the DC rate, the interest rate, and timing of payments for qualifying developments. It is possible, that some developers would prefer to pay the charge at the normal time instead of deferring payments with interest. Delegated authority is requested to enter into such agreements.

Establishment of Development Charge Rate

As of January 1, 2020 development charge rates will be set for a development at the latter date of an application for site plan or zoning amendment. This rate will be frozen for two years after the approval of the application. Should the two year period expire before DCs become payable, the rate will no longer be frozen and will be calculated at the time payable. DC rates will still be indexed annually on April 1st; however, the rate freeze will preclude the ability to index the DC rate by the construction price index for developments between application date and date payable, which may lower the purchasing power of DC collections at the time of capital project delivery.

Interest on Development Charges

Prior to these changes to the DCA, development charges were collected in full at the time of building permit issuance and at current rates (indexed annually). The rate freeze and deferral of payment for certain development types directly impacts the amount and timing of collections to pay for growth related capital needs.

The legislation provides the authority to charge interest to cover the costs associated with the rate freeze and deferral of payment, as the Minister recognizes that municipalities may incur additional costs. For deferrals, interest may be charged from the date the development charge would otherwise have been payable (building permit), to the installment dates thereafter. With regards to the rate freeze, interest

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can be charged from the date of the site plan or zoning amendment application to the date DCs are payable. While the DCA includes the ability for the Province to prescribe a maximum interest rate, they will not do so at this time. Through discussion with the Region of Halton and local municipalities, staff are recommending that the prime lending rate of the town's financial institution be used for any applications received from January 1, 2020 and for any developments eligible to pay DCs in installments. Over time, the prime lending rate has generally reflected the historical indexing rates (some years may be higher and others lower). The interest rate will be monitored for appropriateness in connection with the cost of these changes, and staff will report back as necessary.

Pending Legislative Changes

Not yet proclaimed is the added mandatory exemptions for additional dwelling units. O. Reg. 454/19 amends the legislation to allow for DC exemptions for the creation of additional dwelling units in new residential buildings and more than one unit in existing rental residential buildings. This would increase DC exemptions which are funded by the property tax base.

The use of an interest rate will aid in minimizing the impact that the rate freeze and deferrals have on DC funding. Staff will monitor the interest rate in connection with the associated costs and report back as necessary. The enacted changes will also result in increased administrative costs, and staff are exploring technological solutions and changes to processes to address these impacts.

Community Benefits Charge Authority

The remaining parts of Schedule 12 of the *More Homes, More Choice Act*, once proclaimed, will establish a new authority under the *Planning Act* for municipalities to charge for community benefits with respect to land to be developed or redeveloped. This section of the report provides Council with information and commentary on ERO No. 019-1406, the proposed regulatory matters pertaining to the community benefits authority (Appendix A), to be provided to the Ministry of Municipal Affairs and Housing.

The Province has considered feedback from municipalities and made positive changes to the services that would be included in a community benefits charge. The first set of draft regulations proposed that park development and recreation, libraries, parking, and general government studies no longer be eligible services under the DCA and would transition to a capped community benefits charge (CBC). Of the town services which are currently subject to DCs, the new proposal only recommends migrating parking to the CBC. The proposed regulation also removes the 10% mandatory discount for the other soft services staying in the DCA. It is unclear whether general government studies, which include service area master

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plans and planning related studies such as the Official Plan, will remain in the DCA or be considered as part of a CBC. The town's growth capital forecast is based on the 2018 Development Charges Background Study, with ongoing consideration to development activity and related cash flows. With libraries, park development and recreation remaining eligible development charge services, there is more certainty that projects required to maintain service levels as the town grows will be delivered in a timely manner while ensuring that growth pays for growth to the greatest extent possible.

The proposed regulation significantly impacts the way the town secures parkland under the *Planning Act*. Section 42 (Conveyance of land for park purposes) and Section 51.1 (Parkland) provide for the ability to apply a parkland dedication rate of 2% for commercial or industrial development and 5% for residential development in the form of land or cash in lieu. Currently, an alternative rate of 1 hectare per 300 units in land or 1 hectare per 500 units in cash-in-lieu of parkland can be applied for higher density residential development. This alternative rate would be removed under the proposed regulations. Further, in order to secure land for parks, a municipality must choose between using the parkland dedication rate available in s. 42 or s. 51.1, or by using the community benefits charge authority under the revised Section 37.

Section 37 of the *Planning Act* is currently a tool for bonusing, allowing Council to permit an increase to the height and density of a development in return for the provisions of facilities, services, or other matters that benefit the surrounding community. This tool will no longer be available upon proclamation of Schedule 12 to the *More Homes, More Choice Act*; the existing s. 37 of the *Planning Act* will be repealed and the new s. 37 (Community Benefits Charges) will be in force. The town has utilized the existing s. 37 to approve additional height in exchange for in-kind public benefits as well as cash contributions to provide for public benefits as outlined in the Official Plan. There has been an increasing number of development applications requesting additional height which would qualify for bonusing. The lack of clear definitions of capital costs and eligible services in the CBC raise doubt as to the ability of the town to collect for public benefits in the same manner it has in the past.

A municipality must now choose between requiring parkland (land or cash in lieu) at the basic parkland dedication rates of 2% (industrial/commercial) and 5% (residential), or establishing a CBC to secure funds to acquire land for parks, as well as other community services such as affordable housing, child care facilities, social services, parking and by-law enforcement. The CBC would be subject to a cap of 10% for lower tier municipalities as well as a requirement that municipalities justify the amount of a charge based on increased need for community services associated with new development.

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The province is seeking feedback on the following, further discussed below:

- Required content of a community benefits charge strategy
- Services eligible to be funded through development charges
- Percentage of land value for determining a maximum community benefits charge
- Timeline to transition to the new community benefits charge regime
- Community benefits charge by-law notice
- Minimum interest rate for community benefits charge refunds where a by-law has been successfully appealed
- Building code applicable law

Required content of a community benefits charge strategy

The content in a CBC strategy is very similar to that of a DC Background Study, including public consultation. The anticipated type, amount and location of development or redevelopment subject to a charge, and the subsequent increase in need for services are to be identified. The associated capital costs must be determined, an analysis of any benefit to existing residents, excess capacity in a service, and a parks plan and parkland per capita consideration. The parameters identified are like that of the DC Study, where consideration is given to service levels, uncommitted excess capacity, and benefits to existing development. The undertaking of a CBC strategy will be extensive and staff recommend that the costs related to such a study and the required parks plan be recoverable through the CBC.

Services eligible to be funded through development charges

The initial regulatory proposal on June 21, 2019 removed discounted (soft) services from the DCA, and these were to be included in a CBC. For the town, these services are park development and recreation, libraries, municipal parking and general government studies. The new proposal would remove municipal parking, and potentially general government studies, from the development charge. The proposed regulatory matters are not clear on whether general government studies (master plans, planning studies) will remain in the DCA.

The services remaining in the DCA would be fully funded, and would no longer be discounted services. A discount to certain services was mandated in 1999 (DCA, 1997) and reduced the growth costs recoverable for these services by 10%. The 2018 DC Background Study applied a \$14.9 million discount to park development, indoor recreation, and libraries over the 2017-2026 time period. This mandated discount would no longer be required, increasing the amount recoverable.

There are a number of services that have growth driven capital costs and are ineligible from development charges (i.e. general administration facilities,

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technology), reducing the municipalities ability to ensure that growth pays for growth. The removal of municipal parking and potentially general government studies from eligible services under the DCA and addition of these under a capped CBC may put a limit on the extent to which growth related costs are funded by growth. As such, staff recommend that parking and general government studies remain an eligible service under the DCA in order to achieve revenue neutrality. General government studies, which include service area master plans and planning studies such as updates to the Official Plan, are essential in a growing community. The 2018 DC Background Study identified a need for additional parking spaces in the Downtown, Kerr Village, as well as various expansions to the on-street parking network. Beyond the capital forecast period, parking in the Midtown area will be required. A town-wide parking study is currently being updated, which could be used to inform a potential community benefits charge for parking.

Percentage of land value for determining a maximum community benefits charge

The proposed regulations include a cap based on land value for services covered under the CBC. The proposed cap is 10% of land value for lower tier municipalities, 5% for upper tier municipalities, or 15% for single-tier municipalities. The percentages proposed are intended to reflect the services each offer; however, they appear to limit two-tier municipalities, and give flexibility to single-tier municipalities in supporting a maximum CBC. Flexibility should also be given to two-tier municipalities in order to utilize the CBC in order to meet growth needs, with the ability to migrate cap room between tiers by agreement.

For the town, the major potential impact of a capped CBC is with parkland. With the prevalence of higher density development, the removal of the alternate parkland rate raises serious concern with the ability of the town to achieve the necessary parkland to accommodate this form of growth. In 2016, Bill 73 reduced the alternate rate for cash in lieu from 1 hectare per 300 units, to 1 hectare per 500 units. Through the proposed regulations, the Province is removing this alternate rate entirely.

In 2017, a Five year Review of the 2012 Parks, Recreation and Library Facilities Master Plan recommended the continued provision target of 2.2 hectares of active parkland per 1,000 residents. Active parkland provides for structured and unstructured recreation and leisure activities and takes the form of community parks, neighbourhood parks, and village squares and parkettes. This target has been in place since 1999, and the master plan notes that to achieve this target over the long-term the town must continue to maximize parkland dedication amounts and supplement this through acquisition or other arrangements. The town has a Master Parkland Agreement secured as part of the North Oakville East Secondary Plan appeals, which has been and will continue to provide for parkland in North Oakville. A Parks and Open Space Strategy is underway and will be analyzing park needs and opportunities, including how to deliver parks in an increasingly urban

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environment. The proposed regulations have a significant impact on the tools available to provide for parks and open space in the town, and the strategy will now need to consider the impacts of the capped CBC.

The CBC can also be levied for costs related to child care facilities, affordable housing, social services, parking and by-law enforcement. Currently, the town collects DCs for growth-related parking costs, and the proposed regulation allows for the potential to recover growth costs for by-law enforcement. The share of these services on the 10% cap would be minimal under the town's current capital plan. Nevertheless, these services could be impacted if parkland or other services use up the cap. A clear list of services and definition of capital costs has not been included. Based on the released information, the eligible services under the CBC (with the exception of parkland) have historically been included under development charge authority, and it is recommended that they continue in this manner, and that the CBC serve as a tool for parkland only.

It is unclear how the CBC cap was determined and what financial analysis supported it. There are varying land values across the Province, as well as within the Town of Oakville. The form of development has a significant impact on the percentage of land value calculation. At this time, it is too soon to quantify the impact of the 10% cap to the town as there are a number of variables that will take time to analyze, including a parks needs study and assessment of future development. Having one cap across the province and for all types of development (high vs low density, residential vs non-residential) may not be reasonable. Staff recommend that the Province undertake further consultation with municipalities in order to determine the feasibility of a singular cap or multiple caps that will allow for municipalities (both single and two-tier) to meet the service needs under the community benefits charge authority. It is also recommended that any set cap (or caps) be reviewed on an ongoing basis to ensure effectiveness as capital costs and land values fluctuate.

Timeline to transition to the new community benefits charge regime

Existing development charges and parkland requirements, including the alternative rate continue apply during a transition period, after which the town must choose between 5% residential /2% commercial parkland requirements and the charges available under a CBC By-law. As discussed, the content of a CBC Strategy is very similar to that of a DC Background Study. DC by-law development and implementation typically takes a minimum of two years. It also appears that the findings from a parks plan would need to be incorporated into the Official Plan. A transition period of one year is simply not enough time to prepare a CBC strategy given the extensive requirements. The date of transition should be a minimum of eighteen months, and staff recommend two years from the proclamation date to fully consider and implement a CBC. There are no details on the whether there will be

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an expiry date for a CBC By-Law; if there is to be an expiration it is recommended that it coincide with a municipalities DC By-Law as this allows for a wholesome look at growth needs.

Community benefits charge by-law notice

Public notice is in a similar fashion to that of the Development Charges By-Law.

Minimum interest rate for community benefits charge refunds where a by-law has been successfully appealed

The minimum interest rate for refunds following successful appeal is the same as that of a refund under the Development Charges By-Law, which is the Bank of Canada rate at time of by-law enactment.

Building code applicable law

Inclusion of the payment requirements for CBC ensures that payment occurs prior to building permit, in the same manner as DCs. The DCA allows for early or late payment agreements through Section 27. These agreements are typically used to defer DCs in the case of temporary, conditional, or below grade building permits that constitute the first building permit, to be payable at time of the first above grade building permit. It is recommended that CBCs have a similar mechanism whereby they can be deferred and land valuations and collection would take place prior to the first above grade building permit to ensure that the site is remediated and ready for development, since the land value is contingent on market conditions and site quality.

Other matters

There are a number of matters pertaining to the community benefits charge authority that are not addressed in the proposed regulation, and were in prior draft regulations. These include: a requirement to allocate 60% of funds in a year, reporting on community benefits and parkland, exemptions from community benefits, the appraisal process, the LPAT appeals process, and the community planning permit system. The comments provided previously, with Council Resolution, at the August 6, 2019 Planning and Development Council meeting related to these matters remain unaddressed.

CONCLUSION:

The changes to the DCA that are now in force will increase administrative costs and financial risk associated with deferred development charge payments and freezing of development charge rates. Approval of the prime lending rate of the town's financial institution as the interest rate will aid in minimizing these risks.

The comment period for ERO No. 019-1406 expires on March 30, 2020. Staff are recommending that this report be endorsed and submitted to the Province, along

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with the Council resolution, as the Town of Oakville's comments on the proposed regulations related to Bill 108. The town's submissions can be summarized as follows:

- Maintaining park development, recreation and libraries as development charge eligible services and the removal of the statutory 10% deduction increases revenue for these services, and staff commend the Province on this measure.
- The community benefits charge authority should pertain to parkland acquisition only, and other services including municipal parking and general government studies should remain as development charge eligible services in order to achieve revenue neutrality for these services.
- The undertaking of a CBC strategy will be extensive and staff recommend that the costs related to such a study and required parks plan be recoverable through the CBC.
- The percentage of land value for determining a maximum CBC requires extensive analysis and investigation, and there is not enough time to do so in the short commenting period. Further consultation with municipalities is recommended in order to determine the feasibility of a singular cap (or multiple caps) that will allow for municipalities to meet service needs. The ability to migrate the cap limits for upper and lower tiers by agreement should be given.
- If a maximum cap is set for the community benefits charge, the Minister should have the ability to adjust as necessary to maintain revenue neutrality.
- The timeline for transition to the community benefits charge regime should be two years from the proclamation date in order to satisfy all required content of a community benefits charge.
- The community benefits charge authority should be imposed at the first above grade building permit to ensure that the site is remediated and ready for development, since the land value is contingent on market conditions and site quality.
- The proposed regulations should be released in draft prior to being finalized.

Staff will continue to work through changes to internal processes and explore technological solutions related to the new requirements for development charge collections, as well as the administration of a community benefits charge. Staff will report back to Council if additional staffing resources are identified as a result of the new administrative requirements associated with Bill 108.

CONSIDERATIONS:

(A) PUBLIC

Members of the public may provide comments on the proposed regulatory matters pertaining to the community benefits authority discussed in this

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report through the related postings on the Environmental Registry of Ontario (ERO) website (<https://ero.ontario.ca/>).

(B) FINANCIAL

Bill 108 introduces significant changes to the financial tools available to the town, which are anticipated to impact the town's ability to ensure that "growth pays for growth" to the maximum extent possible, and the protection of complete communities. The changes to the Development Charges Act that are now in force will increase administrative costs and financial risk associated with deferred development charge payments and freezing of development charge rates. Proposed regulatory matters pertaining to the community benefits authority may further impact the revenue neutrality of Bill 108.

(C) IMPACT ON OTHER DEPARTMENTS & USERS

Bill 108 impacts a number of departments including Planning, Building, Legal Services, Parks and Open Space, Parking, and Financial Planning.

(D) CORPORATE AND/OR DEPARTMENT STRATEGIC GOALS

This report addresses the corporate strategic goal to:

- be fiscally sustainable
- be accountable in everything we do

(E) COMMUNITY SUSTAINABILITY

Staff continue to be concerned about the impacts that Bill 108 may have on environmental and economic sustainability.

APPENDICES:

- Appendix A ERO No. 019-1406, Proposed Regulatory Matters Pertaining to Community Benefits Authority Under the Planning Act, the Development Charges Act, and the Building Code Act
- Appendix B Letter from the Ministry of Municipal Affairs and Housing
- Appendix C Ontario Regulation 454/19

Prepared by:
Matt Day, MBA, CPA, CGA
A/Manager, Development Financing &
Investments

Submitted by:
Nancy Sully, CPA, CMA
A/Commissioner- Corporate Services
and Treasurer