

4/20/2020

Mr. John Ballantine
Ministry of Municipal Affairs and Housing
Municipal Finance Policy Branch, 13th Floor
777 Bay Street
Toronto, ON
M7A 2J3

From: Leona Savoie, Hullmark Developments Ltd.

Dear Mr. Ballantine,

**RE: Comments regarding the Province of Ontario's Proposed Regulatory Matters Pertaining to Community Benefits Authority Under the Planning Act, the Development Charges Act and the Building Code Act
ERO Nos. 019-1406**

We are pleased to submit our comments for your review and use as part of the Province of Ontario's public consultation on the proposed components of a new community benefit charge authority in response to ERO 019-1406. As a Toronto-based development firm with projects ranging from small-scale renovations along commercial main street, adaptive re-use projects to larger, mixed-use developments we want to emphasize that different development product types should be considered when establishing the community benefits authority regulations. We believe the following recommendations support the objectives of the province's Housing Supply Action Plan to increase housing supply and affordability.

General Comments

For clarity and certainty on the CBC process, additional information is required regarding the CBC strategy, appeal rights and land valuations. Providing clear direction to municipalities on the requirements of the CBC strategy and by-law will support transparency in the process. Furthermore, we ask that eligible soft cost services be removed from the CBC and funding through development charges is restored.

Community Benefits Charge Applicability

The province should consider the application of the Community Benefits Charge ("CBC") to different types of development, based on scale and use. A one-size-fits-all approach is not suitable across the boards and will significantly impact the affordability and feasibility of bringing projects to market, with significant financial impacts on renovations, low-rise and mid-rise developments. Furthermore, under the existing

regime the City of Toronto does not apply Section 37 contributions under a certain size threshold and may not employ the same s.37 approach if a project has significant heritage value. We ask that the following recommendations be considered:

- Costs for non-residential developments should be maintained in accordance with the existing development charge regime.
- Consideration of adorable housing units and drastically reducing or exempting the units, or entire projects, from CBCs.
- Providing exemptions for mid-rise and low-rise developments and projects with a net residential development density under 100 units to maintain a diversity of housing types and affordability.
- Exempting CBCs and Development Charges to any buildings that are being renovated (minor and substantial) to encourage adaptive re-use.

Transition and Timing

We also ask that additional clarity is provided on the transition policies and the development industry is consulted further on these matters.

Should you have any questions or require any additional information, please do not hesitate to contact the undersigned.

Yours truly,

Leona Savoie
Senior VP, Development