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**MDTR GROUP**  
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April 20, 2020

Ministry of Municipal Affairs and  
Housing  
777 Bay Street  
College Park 13<sup>th</sup> Floor  
Toronto, ON M7A 2J3

Via email to:  
John.ballantine@ontario.ca

**Attn: John Ballantine, Manager, Municipal Finance Policy Branch**

Dear Sir:

**RE: Community Benefit Charge Regulations**

MDTR Group is engaged in various land development projects across the Province of Ontario.

It is our understanding that the new CBC was created to allow municipalities to impose a charge to pay for capital costs of facilities, services or matters due to development and redevelopment (items that would be removed from the Development charges and thus neutrality would be preserved).

Unfortunately, given the total of services that now appear to be eligible, neutrality will not be preserved, and an overall increase will most likely be the result.

This overall increase to land development costs will impact housing costs and affordability generally in communities throughout Ontario.

According to analysis completed by professionals in the development industry, it is our understanding that based on preliminary calculations, the expected increase to development fees and levies for low-density is significant and is disproportionately impactful to low-rise built form in comparison with higher density-built form.

Based on said analysis, the impacts on a single detached unit could trigger an increase between \$20,000 to \$30,000 to the average cost of a home translating into an automatic five to seven percent increase to the buying public.

This would be an unfair discrimination against the low-rise form and would punish the municipalities around the GTA periphery who still have lands where subdivision communities may be built.

We believe that the intended revisions were meant to be revenue neutral and not to create biases between housing forms favoring large built up centers at the expense of areas still growing.

We ask that you kindly consider appropriate modifications in order to implement the initial objective of neutrality in transitioning services from development charges to community benefit charges.

Yours truly

MDTR GROUP

Per:  \_\_\_\_\_  
A.S.O.

JS/d