

April 20, 2020

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Parkbridge Lifestyle Communities submission on proposed regulations under the *More Homes, More Choice Act, 2019 (Bill 108)*:

ERO 019-1406 - Proposed regulatory matters pertaining to community benefits authority under the Planning Act, the Development Charges Act, and the Building Code Act

Parkbridge Lifestyle Communities Inc. is Canada's largest owner, developer, and operator of land lease communities. We are proudly 100% Canadian owned and have recently relocated our national head office to Collingwood, Ont. Our communities provide attainable "missing middle" housing throughout Ontario's rural and small urban centres; with a significant number of seniors choosing our communities because of the community cohesion and affordable lifestyle we can offer them. Our communities are often a key component in local economies, as they broaden the mix of available housing at a cost to the home owner that is generally 30% less than freehold ownership. Parkbridge is supportive of the *More Homes, More Choice Act, 2019 (Bill 108)* and the *Housing Supply Action Plan*, and were pleased to see land lease being recognized in the updated *Provincial Policy Statement* as an important part of the housing option spectrum. However, we are writing this letter in response to the proposed Community Benefits Charges (CBC) framework, as we are concerned about the financial impact it may have for new home buyers.

Our concerns relate to how the proposed community benefits may increase the burden on home buyers in small urban centres and rural areas; given the lower-density forms of housing that make up these markets. Note that the CBC charges borne by home purchasers, could be magnified by the proportional share that will be paid through their home financing.

We suggest that options be considered that better reflect lower-density, primarily ground-oriented, housing that is represented in more rural areas, specifically:

- i. CBC approaches that address low-rise, greenfield development;
- ii. Earlier land appraisals in the process, so that they do not "tax" infrastructure investments;
- iii. Stakeholder engagement framework for transparency, as is typical for other Planning Act processes.

Parkbridge has been supportive of this provincial government's initiatives to address housing supply challenges. We trust you will consider our comments and look forward to working with the Ministry in the future to help provide housing options throughout Ontario.

Sincerely,



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