

August 20, 2019

The Honourable Steve Clark
Minister of Municipal Affairs and Housing
College Park, 17th Floor
777 Bay Street
Toronto, ON
M5G 2E5

Re: The Impact of Bill 108 and Proposed Regulations on the Residents of the City of Brampton, An Age-Friendly Community

Dear Minister Clark:

As citizen members of the City of Brampton's Age-Friendly Advisory Committee, we appreciate the opportunity to provide comments and feedback to the Ministry of Municipal Affairs and Housing relevant to proposed regulations, enacted through Bill 108, as it pertains to the *Planning Act*, *Development Charges Act*, and proposed Community Benefit Charges.

More specifically, we would like to comment on how Bill 108 affects the City's first ever Age-Friendly Strategy and Action Plan ("the Plan") recently endorsed by Council, as the Plan supports Brampton's commitment to creating age-friendly, liveable and resilient communities.

Age-Friendly Community Context

The City of Brampton is the second-fastest growing of Canada's large cities, having a population over 600,000, which is set to grow to 890,000 by 2041. Brampton is a vibrant and diverse community seeking to accommodate future growth in a responsible manner.

Brampton aspires to be a leader in age-friendly community building by providing opportunities to age-in-place. The City's first ever Age-Friendly Strategy and Action Plan was unanimously endorsed by Council on June 19, 2019, and establishes a course of action for positive transformation to meet the needs of residents of every age and ability. The Plan includes 55 action items and is identified as one of the key initiatives within the 2018-2022 Term of Council Priorities. The Plan addresses both physical factors, such as accessible housing and public spaces, as well as social factors, including service delivery and recreational programs.

Community Benefit Charges (CBCs)

Bill 108 will have significant impact on municipalities and residents alike. It seeks to combine three funding mechanisms used to fund parks, libraries, recreation centres and other community infrastructure into one community benefit charge (CBCs). As currently proposed, the Bill will place a cap on the recovery of growth-related infrastructure costs, whereby municipalities will be forced to choose between delivering parks and providing other community facilities, offloading additional costs to the tax payer, or to reduce service levels.

Essentially, municipalities will be under-funded in either land for community facilities, or revenue to build community facilities, creating gaps in living conditions for many disadvantaged residents. Adequate community and social infrastructure is critical to the development of complete communities and improving quality of life for all residents, especially youth, young families and seniors.

Other Considerations

The More Homes, More Choice Act limits the City's authoritative use of Inclusionary Zoning as a land-use planning tool to require affordable housing units to be included in residential developments of 10 or more units. Under the Bill, the application of Inclusionary Zoning would be limited to major transit station areas or areas where a development permit system has been adopted. This change appears to be contrary to the stated intentions of the Bill whereby housing options would be limited within greenfield and other redevelopment projects.

There is also concern about the reduced timelines for municipalities to review development proposals under the *Planning Act*. Removing unnecessary red-tape is laudable, however, it is questionable whether the reduced timelines imposed on municipalities for the review of development applications would result in an increase in the delivery of housing units to the market, or alternatively, would result in additional planning appeals to the Local Planning Appeal Tribunal, ultimately affecting residents given the potential financial impact on the local tax base.

In closing, the City of Brampton's Age-Friendly Advisory Committee supports the overarching premise of Bill 108 to improve housing affordability across the Province, however, the Legislation and its current proposed regulations would undoubtedly have a significant impact on the ability of Ontario municipalities to invest in community infrastructure that is vital to improving the quality of life, and ultimately the achievement of age-friendly community objectives which have been embraced by the Provincial Government through such initiatives as the Province's Action Plan for Seniors: *Aging with Confidence*. Further, and of utmost concern, Bill 108 effectively has the very real potential to critically impede the ability of the City of Brampton to control its development destiny.

We would like to once again thank MMAH for the opportunity to provide feedback on important proposed legislations and hope that the comments and recommendations contained herein will be strongly considered as part of the policy consultation process.

Sincerely,



Bob Pesant, Co-Chair,
Age-Friendly Brampton Advisory Committee



Peter Howarth
Member, Age-Friendly Brampton Advisory Committee &
Past President, CARP, Brampton Chapter

CC: *The Honourable Doug Ford, Premier of Ontario*
The Honourable Raymond Cho, Minister for Seniors and Accessibility
Hon. Prabmeet Sarkaria, MPP, Brampton South
Kevin Yarde, MPP, Brampton North
Amarjot Sandhu, MPP, Brampton West
Sara Singh, MPP, Brampton Centre
Gurratan Singh, MPP, Brampton East
Mayor and Members of Council, City of Brampton
Richard Forward, Commissioner, Planning & Development Services, City of Brampton
Peter Fay, City Clerk, City of Brampton