

**Environment, Infrastructure and Community Services Committee**  
**City of Burlington**  
426 Brant St  
Burlington, ON  
L7R 3Z6

**West End Home Builder's Association Submission | Burlington Park Dedication Bylaw Amendment**

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The West End Home Builders' Association (WE HBA) is the voice of the land development, new housing and professional renovation industries in Hamilton and Burlington. The WE HBA represents approximately 300 member companies made up of all disciplines involved in land development and residential construction, including: builders, developers, professional renovators, trade contractors, consultants, and suppliers. During the global pandemic, the residential construction industry was a stabilizing force for the local economy, employing over 4000 people in Burlington, paying \$279.5 million in local wages, and contributing over \$511 million in investment value in 2021. Much as they have been doing for the past 80 years, our members are building the future of Burlington.

The process followed by the City to adopt the proposed new parkland dedication bylaw (which will add millions in potential project costs to new housing development) has significant flaws given a study of Burlington's parkland needs has not been prepared. It has resulted in a lack of transparency, insufficient consultation, and no consideration of transitional provisions. Our association wishes to better understand why this bylaw is being rushed through at this time with little public or stakeholder consultation, when the completed Parkland Provisioning Master Plan will not be released or presented to Council and the public until September. The Parks Provisioning Master Plan should be completed before a substantive update to the bylaw is brought forward to Council. This is putting the cart before the horse.

The proposed changes do not contemplate transition or the impacts on new housing projects. The City and its staff must recognize and appreciate that unprecedented fee increase will either substantially increase the costs for new homebuyers or result in project cancellations. The City of Burlington must appreciate the potential impacts on our industry and afford the industry sufficient time to review and plan for these changes. Ten (10) days notice is insufficient and unreasonable. When this change takes effect next week, it will add an unanticipated cost of \$26,900/unit to midrise buildings or \$18,000/unit for high-rise buildings. The proposed increase will impact a number of projects that have already sold, but not yet commenced construction, which could negatively impact the viability of these projects, construction financing, and ultimately potentially the construction of much needed new housing supply. This impact on the continued erosion of housing affordability in Burlington and its alignment with the City's recently approved housing strategy must be considered prior to implementing such a proposed increase.



The process of completing the Parks Provisioning Master Plan is important to provide evidence to substantiate the increased rates within the Park Dedication Bylaw. In an environment where the CMHC,<sup>1</sup> the Federal government,<sup>2</sup> the provincial government<sup>3</sup> and the City of Burlington<sup>4</sup> have all agreed there is a need for significantly more new housing supply to resolve Ontario's housing crisis, the City of Burlington must carefully consider how adding additional taxes (through the park dedication bylaw) on new housing works in direct conflict with that stated objective.

The West End Home Builders' Association is requesting the City of Burlington:

- Delay implementation of the significantly increased new fees (up by 400-500%) until the conclusion of the City's Parks Provisioning Master Plan. In the interim the City can consider re-enacting the City's current park dedication bylaw to meet the legislated expiry date and continue to collect parkland fees, while completing the necessary studies to ensure the new parkland fee matches Burlington's long term parks provisioning goals.
- Implement transition policies for developments that are currently moving through the site plan application process towards a building permit to not adversely impact needed new housing units in the development pipeline.

Regards,

Sincerely,



Michael Collins-Williams, MCIP, RPP  
Chief Executive Officer  
West End Home Builders' Association

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<sup>1</sup> "Housing Shortages in Canada: Solving the Affordability Crisis" Cmhc-schl.gc.ca, June 23, 2022.

<https://www.cmhc-schl.gc.ca/en/professionals/housing-markets-data-and-research/housing-research/research-reports/accelerate-supply/housing-shortages-canada-solving-affordability-crisis>.

<sup>2</sup> "Making Housing More Affordable" Government of Canada Budget 2022, April 7, 2022.

<https://budget.gc.ca/2022/report-rapport/chap1-en.html>.

<sup>3</sup> "Report of the Ontario Housing Affordability Task Force" Ministry of Municipal Affairs and Housing, February 8, 2022. <https://files.ontario.ca/mmah-housing-affordability-task-force-report-en-2022-02-07-v2.pdf>.

<sup>4</sup> "The Corporation of the City of Burlington Housing Strategy" City of Burlington, May 20, 2022.

<https://www.getinvolvedburlington.ca/19458/widgets/77428/documents/82411>

