



CARRIAGEGATE

July 5th, 2022

Delivered By Email

City of Burlington
426 Brant Street
P.O. Box 5013
Burlington, Ontario L7R 3Z6

Attention: Environment, Infrastructure and Community Services Committee

**Subject: Proposed Parkland Dedication By-law Update
Staff Report: ES-06-22 and By-law 57-2005
City File: 930-55 and 110-04-1**

Carriage Gate Homes is an experienced builder with several ongoing projects in the City of Burlington.

In response to Provincial legislation enacted by the Ontario Legislature through Bill 197 - the *COVID-19 Economic Recovery Act* on September 18th, 2020, the City of Burlington and all other municipalities in Ontario are required to review and update their parkland dedication by-laws prior to September 18th, 2022. In reply to this requirement, City staff and its consultant (Watson and Associates) have prepared an economic background report and Staff Report ES-06-22. This matter is to be considered by the Environment, Infrastructure and Community Services Committee on July 7th, 2022. The notice of this staff report, the consultant's report and the proposed by-law was not made available to the building industry until June 27th, 2022.

It is unfortunate that this information was not made available to the building industry until extremely late in the process, in the absence of meaningful consultation with the building industry, has not provided any transition policies and has not followed the proactive lead of other municipalities. To compound the problem, the information, and recommendations that the committee and council are being asked to approve are seriously flawed as they are based on a new Official Plan that has been appealed and may never be approved and incomplete and missing information. None of the information provided explains, qualifies, or quantifies the existing level of parkland service (LOS) or the potential incremental difference the city aspires to achieve. We recognize that land economics have changed dramatically since the last update to the City's parkland dedication by-law, yet no portions of the City of Burlington have ever been identified as being parkland deficient. The City's failure to bring all the required information together to the public in advance and in the absence of meaningful dialogue and consultation with the building industry is profoundly disturbing.

Perhaps the most glaring omission from the proposed by-law is the lack of appropriate transition policies. Existing planning applications and approvals should be respected. These applications have been prepared and submitted based on the city's fee structure that existed at the time the

applications were made. There are many instances where residential units have already been sold and the financial viability of these projects may be put in jeopardy.

In addition to the matters noted above, there are several other matters that appear to have been overlooked or omitted. These matters include and are not limited to:

1. Phased Development Applications
2. Existing Parkland Agreements
3. Exemptions for Existing Buildings to be Retained
4. Overall Parkland Contribution Limits
5. Net Site Area Deductions
6. Cash-in-Lieu Payments for Infill and Intensification Projects

Notwithstanding the missing information and the glaring omissions, Staff report ES-06-22 recommends that the city-wide parkland dedication fee for high-rise development be increased from \$5,500 per new residential unit to \$23,600 per new residential unit and no transition is proposed to be provided. To provide context, the proposed fee increase for high-density units is well over 420%. An incremental cost of this magnitude cannot be expected to be absorbed by the building industry alone and may jeopardize the financial viability and affordability of projects while at the same time being at odds with the city's very recently approved housing strategy.

Conclusion:

Based on the above, Carriage Gate Homes strongly opposes the proposed parkland dedication by-law. We encourage the city to defer this matter until all necessary information is available and reviewed by interested stakeholders and meaningful consultation has occurred with the building industry, including Carriage Gate Homes. This should not be rushed through amid the summer break and must be provided the attention that it deserves.

We are happy to meet with city staff and members of Council at any time to discuss our concerns. Please contact the undersigned.

Please notify us of any actions made by city committees or by Council regarding these matters.

Yours truly,
Carriage Gate Homes



Mark Bales, MCIP, RPP, MLAI

c.c. Mayor Marianne Meed Ward
Councillor Kelvin Galbraith
Councillor Lisa Kearns
Councillor Rory Nisan
Councillor Shawna Stolte
Councillor Paul Sharman
Councillor Angelo Bentivegna
Brynn Nheiley, Executive Director of Community Planning, Regulation &
Mobility