

March 23, 2022

Region of York
17250 Yonge St,
Newmarket, ON
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RE: Region of York Development Charges public meeting

Dear Chair, Members of Council and staff,

Development charges are an important fiscal tool to recover the cost of growth. Too often these charges are not transparent, fail to cover the full costs of greenfield growth and indirectly penalize infill and missing middle housing.

I encourage the Region and municipalities to support location and housing type specific development charges to encourage intensification through infill, missing middle housing, and specific types of housing, rental and supportive housing. Development charges for low density housing on greenfield sites should cover the full costs of growth.

We need to recognize that market distortions, low interest rates and flawed provincial policy contribute to drive unaffordable housing and the extension of costly infrastructure. If the Region fails to recoup the cost of large infrastructure projects that are being built to facilitate greenfield growth this debt falls to taxpayers. As Pamela Blais notes in her seminal book, [Perverse Cities](#), “Mis-pricing creates hidden, “perverse” subsidies and incentives that promote sprawl while discouraging more efficient and sustainable urban forms – clearly not what most planners..... have in mind.” This mispricing can leave governments with high levels of unfunded debt if the growth forecasted does not materialize.

Since the 2006 Growth Plan was introduced the Region of York has failed to meet population growth forecasts. The current projections to 2051 for York Region are considerably higher than the Ministry of Finance growth forecasts. Building out sewer, water, road and transit infrastructure to meet the Growth Plan forecasts is an enormous financial risk that could potentially bankrupt the regional municipality.

As part of an official plan review process, the Region of York should evaluate growth scenarios (e.g., based on intensification, greenfield densities, housing type and land requirements) to assess, infrastructure requirements and fiscal implications (capital costs, long-term operational/ maintenance costs, replacement costs, and revenues). The [City of Ottawa](#) conducted a study of this nature and it provided needed information to understand the costs of various housing types by location. This cost of growth analysis on the various intensification scenarios should be provided to Council before approving the revised Official Plan.

More transparency around the costs of growth and what development charges cover and fail to assess is important for elected officials to enable them to make good decisions, decisions that are in the best interests of future taxpayers, residents and society.

Sincerely,

Susan Lloyd Swail, MES Pl.
23 Kinsley St, Nobleton, L0G1N0

cc. Mayors and Members of Regional Council