

March 23, 2022

By E-Mail Only to *regionalclerk@york.ca*

Regional Municipality of York
Chairman and Members of Council
17250 Yonge St.
Newmarket, ON L3Y 6Z1

Attention: Christopher Raynor, Regional Clerk

Dear Mr. Chairman and Members of Council:

**Re: Regional Municipality of York
Comments on Development Charge By-law Review 2022**

We are writing on behalf of the landowners identified on Schedule "A" to this letter. The respective property ownerships of our clients' lands within the Region of York are also identified on Schedule "A".

Representatives of our client have participated in initial discussions between Region of York staff and the Building Industry and Land Development Association (BILD) regarding the Region's 2022 Development Charge By-law review. In the context of those discussions, our clients have raised concerns regarding the proposed "Large Apartment" rate that would apply to units of more than 700 square feet. The proposed increase would be more than 30%, as compared to the 2017 rate, which is greater than for other unit type. The rate increase has been calculated, in our clients' view, based on a key underlying assumption that is not appropriate. In particular, the persons per unit (PPU) for this unit type has been increased by over 14% which is not warranted.

As proposed, the new rate for Large Apartments will undermine affordability for this unit type which is becoming more prevalent over time and is critical addressing housing supply needs in York Region.

The time available to review the Region's background study work has been limited. The comments in this letter are therefore summary in nature. Our clients look forward to an opportunity to continue discussions with Region of York representatives and reserve their right to make further submissions as the process continues.

Thank you for your consideration of this submission on behalf of our clients.

Sincerely,
DAVIES HOWE LLP



Kimberly L. Beckman

KLB:SL

Schedule A

Landowner	Address
5031695 Ontario Inc.	171 Maplecrete, 140 Doughton, 160 Doughton, Vaughan
1930328 Ontario Inc.	2901 Highway 7, Vaughan
1834371 Ontario Inc.	2951 Highway 7, Vaughan
1963356 Ontario Inc.	7750 Bayview Avenue, Markham
1930368 Ontario Inc.	9781 Markham Road, Markham
Promenade Gerneral Partner Inc.	1 Promenade Circle, Markham
2701382 Ontario Inc.	1 Promenade Circle, Markham