Housing Supply Action Plan (Bill 108): What? So What? Now What?

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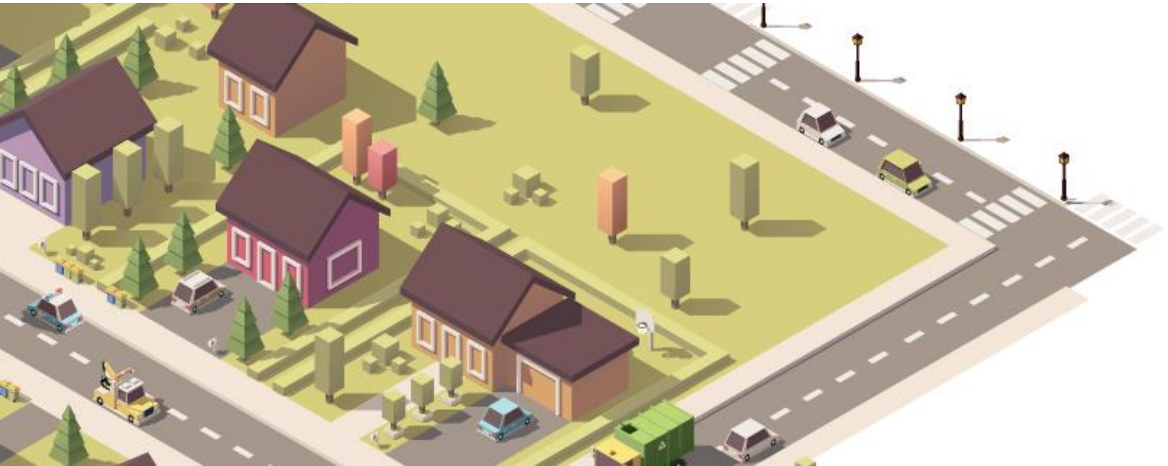
September 19, 2019



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Today's Session

1. Background on the *More Homes, More Choice Act, 2019*

2. Focus on the new Community Benefits Charge
   a) Hemson Consulting Ltd.
   b) Watson & Associates Economists Ltd.

3. Tying It All Together

Part 1: Background on the *More Homes, More Choice Act, 2019*

- The *More Homes, More Choice Act, 2019*
- MFOA Submission on proposed regulatory changes related to the Act
- Implementation of the Community Benefits Charge

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Growth Pays for Growth

- Previous DC - direct relationship between development paying for growth-related capital costs.

  - Residential development – Paid on type of dwelling
  - Non-residential development – Paid on square footage.

Services Exempt from DCs

- Cultural or entertainment facilities
- Tourism facilities
- Land for parks
- Hospitals
- Waste management services
- Infrastructure for municipal administration and local boards

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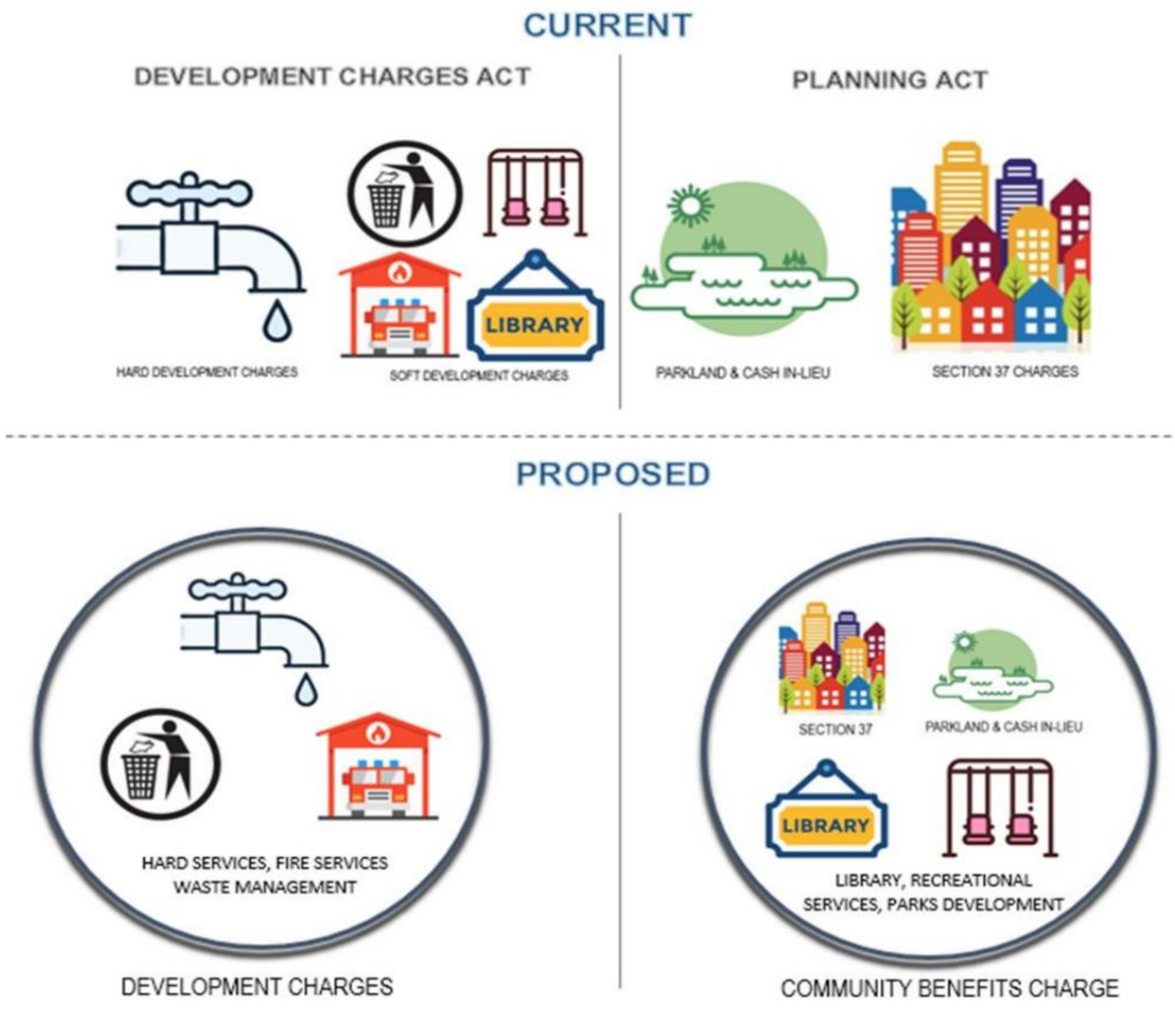
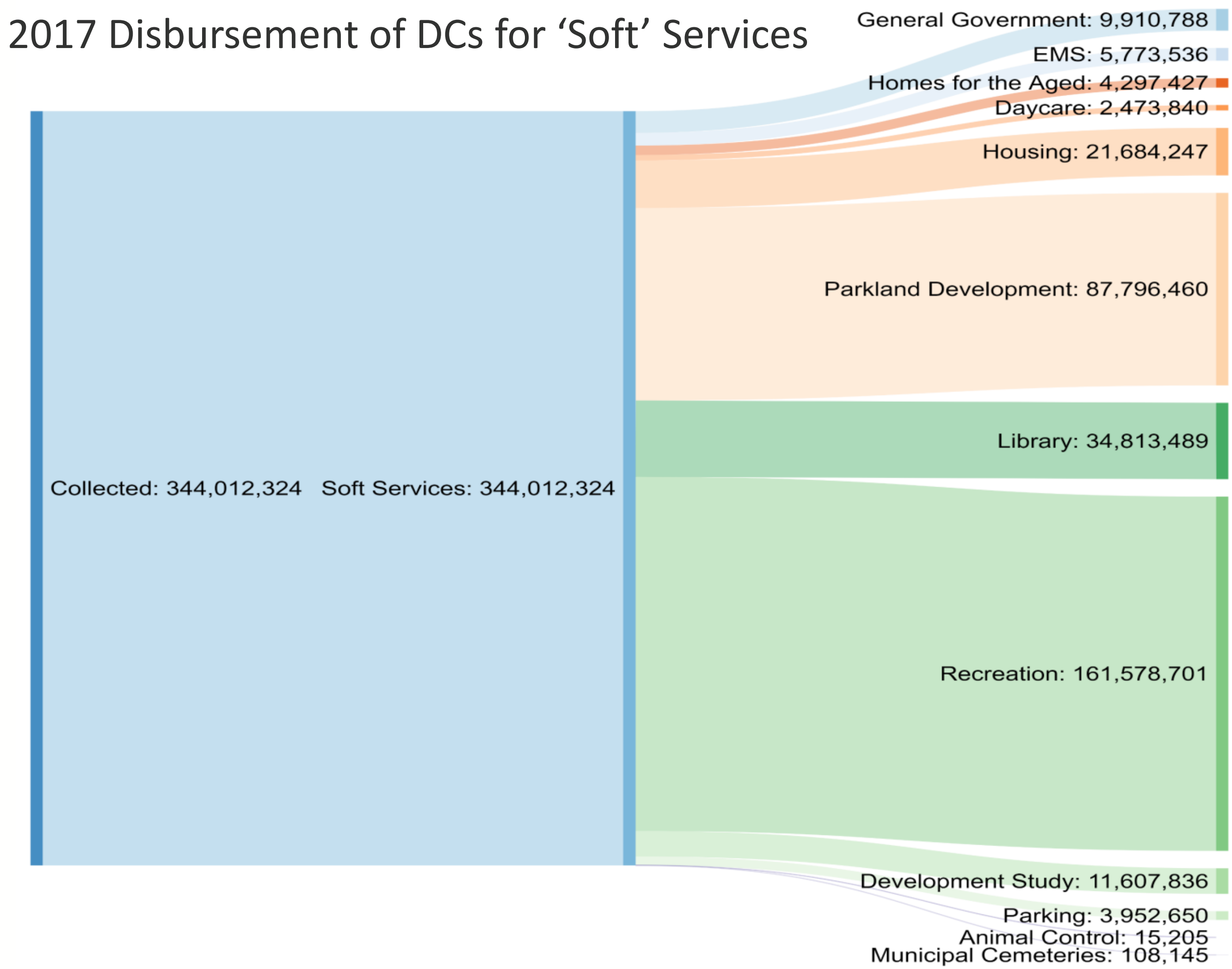
Hard vs. Soft Services



Markham report to Council on Bill 108 regulations, July 26/19

Development Charges



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How did we get here?

Dec 1 ‘18 - Jan 31 ‘19

Province’s initial consultations on how to increase the housing supply in Ontario

MFOA submits technical response to consultation

May 2 ‘19 - May 31 ‘19

Bill 108 is introduced and 30 days are provided for public comment

MFOA presents to Standing Committee on Justice Policy and submits comments

June 06 ‘19

Bill 108, the More Homes, More Choice Act receives Royal Assent

June 21 ’19 - Aug 21 ‘19

Proposed regulatory changes pertaining to Schedules 3 (Development Charges Act) and 12 (Planning Act) of Bill 108 posted to the ERO for comment

MFOA submits comments on the ERO postings

July ‘19 -

Province establishes 16 person working group on the CBC cap

MFOA establishes complementary CBC cap working group

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Fall 2019

- **September 3rd**: All changes to the *Planning Act*, except for those related to the CBC, came into force, as specified by proclamation.

- Anticipated posting of proposed CBC caps on the Environmental Registry of Ontario

MFOA Submission Approach

Four principles:

1. Growth should pay for growth
2. Complete, Vibrant Communities are Good for Everyone
3. Provincial Red Tape Costs Municipalities Time and Money
4. Provincial Legislation Should be Enabling and Permissive

Principle 1: Growth Should Pay for Growth

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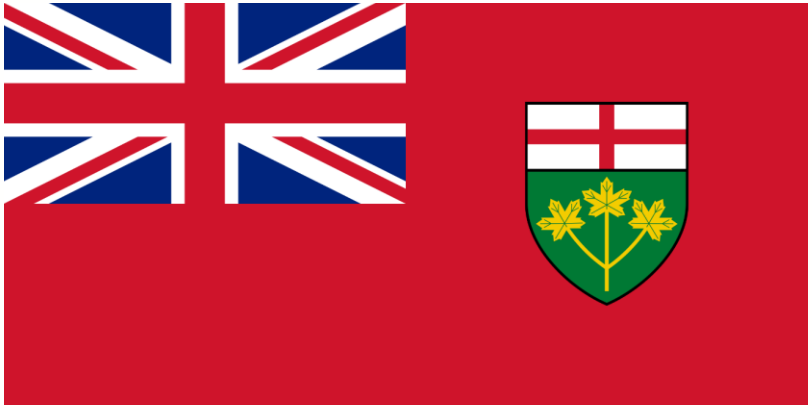
Principle 2: Complete, Vibrant Communities are Good for Everyone

Principle 3: Provincial Red Tape Costs Municipalities Time & Money

Principle 4: Provincial Legislation Should be Enabling and Permissive



Community Benefits Charge

- DCs had a direct link between cost and anticipated revenues.

- CBC is an unknown framework.
  - Proposed cap - prescribed percentage of land value

Community Benefits Charge

- CBC formula and maximum cap still unknown

- MFOA believes the prescribed caps will need to:
  1. Capture 100% of growth-related costs
  2. Indexed to reflect changing cost structures
  3. Be predictable
  4. Reflect local circumstances

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Community Benefits Charge

$$\text{CBC} = \frac{\text{Cost of Service}}{\text{Value of Land}}$$

Community Benefits Charge

- Services are driven by people
- Land values **do not** drive people

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PART 2:
ANALYSIS BY HEMSON CONSULTING LTD.

Hemson Preliminary Analysis Suggests

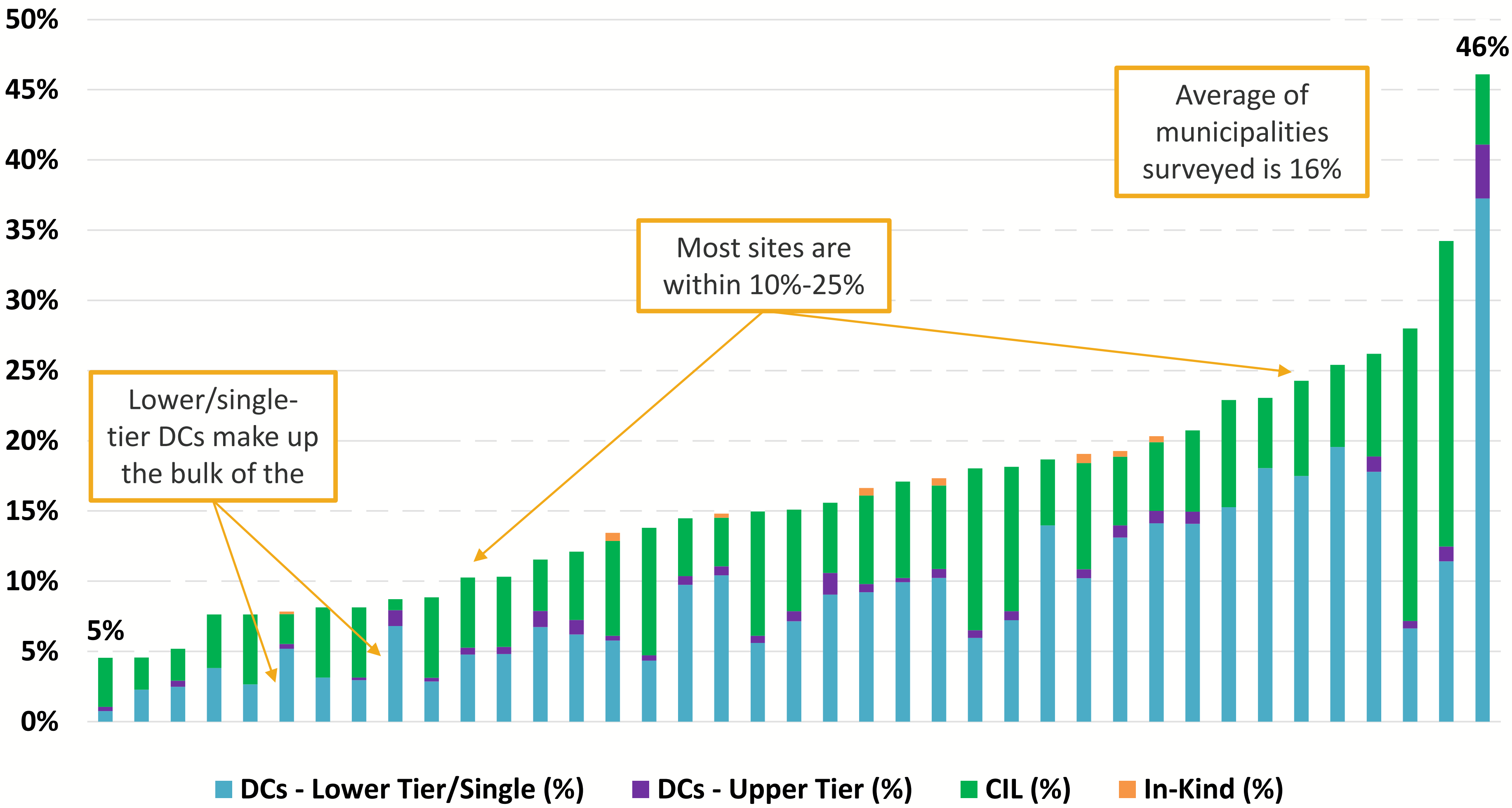
- At minimum, two types of land value percentage caps are required:
  - Residential
  - Non-residential

- The residential land value cap should be further subdivided:
  - High density
  - Other (low/medium density)

Residential Site Specific Analysis

- Historical exercise
  - What is needed to maintain historical revenues
- Hemson has tested what land value percentage thresholds would be required to maintain existing revenues collected under the current regime
- Data collected from GTA and non-GTA municipalities on a site specific basis

Site Specific
Low/Medium Density Residential



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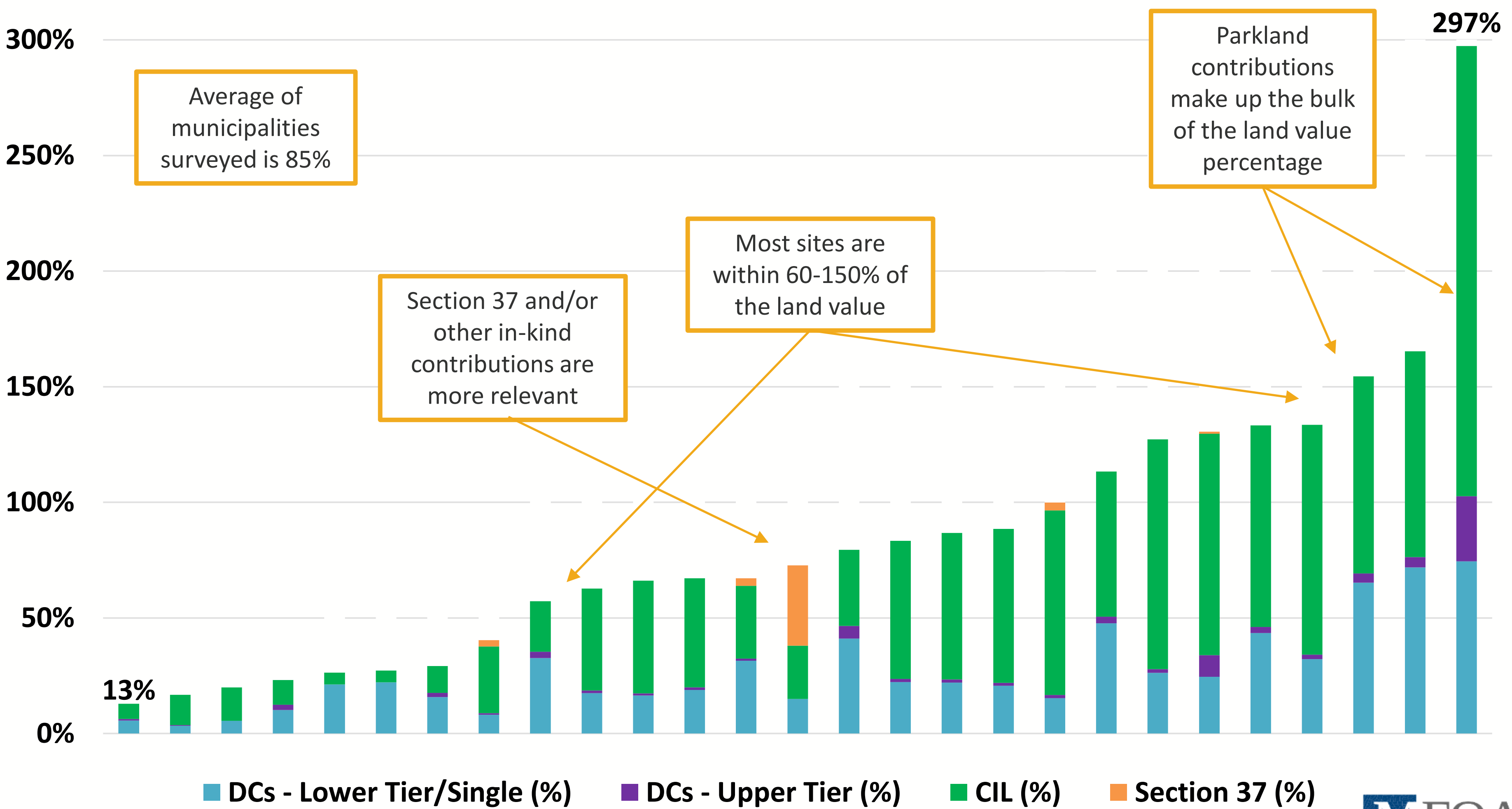
Site Specific High Density Residential



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Municipal Wide Residential Analysis

10-year Planning Horizon

DC Eligible Costs (DC Study) **$87.56M** + Parkland (Dedicated or CIL) **$52.24M** + Other In-Kind Contributions **$1.2M**

Land Area Forecast **Low/med = 235 ha** **High =17 ha** × Value of Land **Low/med = $1.5M/ha** **High = $3.5M/ha**

=

% of Land Value

Low/Med Density **= 30%**

High Density **= 105%**

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Hemson’s Preliminary Conclusions

1. **Range of required percentages** between municipalities, and even within municipalities, is very broad

2. Percentages for **residential** developments and mixed use developments **tends to be much higher than non-residential** developments

3. Required percentages for residential development in greenfield locations appears to be much lower than for redevelopment in built up areas **(% tend increases with density type**)

4. The required percentages are particularly high for development that have **density bonusing contributions**

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PART 2:
ANALYSIS BY WATSON & ASSOCIATED ECONOMISTS LTD.

Introduction

- Bill 108 Regulation expected later this year which will identify prescribed rates and define details on process, appraisals, etc. for calculating the Community Benefits Charge (CBC)
- Presently, a Technical Committee has been set up by the Province to discuss a methodology for calculating the (CBC)
- A consulting firm has been engaged by the province to assist in this process – very preliminary discussions with the Province appeared to suggest a municipal-wide approach to calculating the CBC (final approach unknown at this time)
- The initial analysis undertaken by Watson, was to test a potential "municipal-wide" approach to develop observations and identify potential issues to be experienced in developing this approach to the calculations

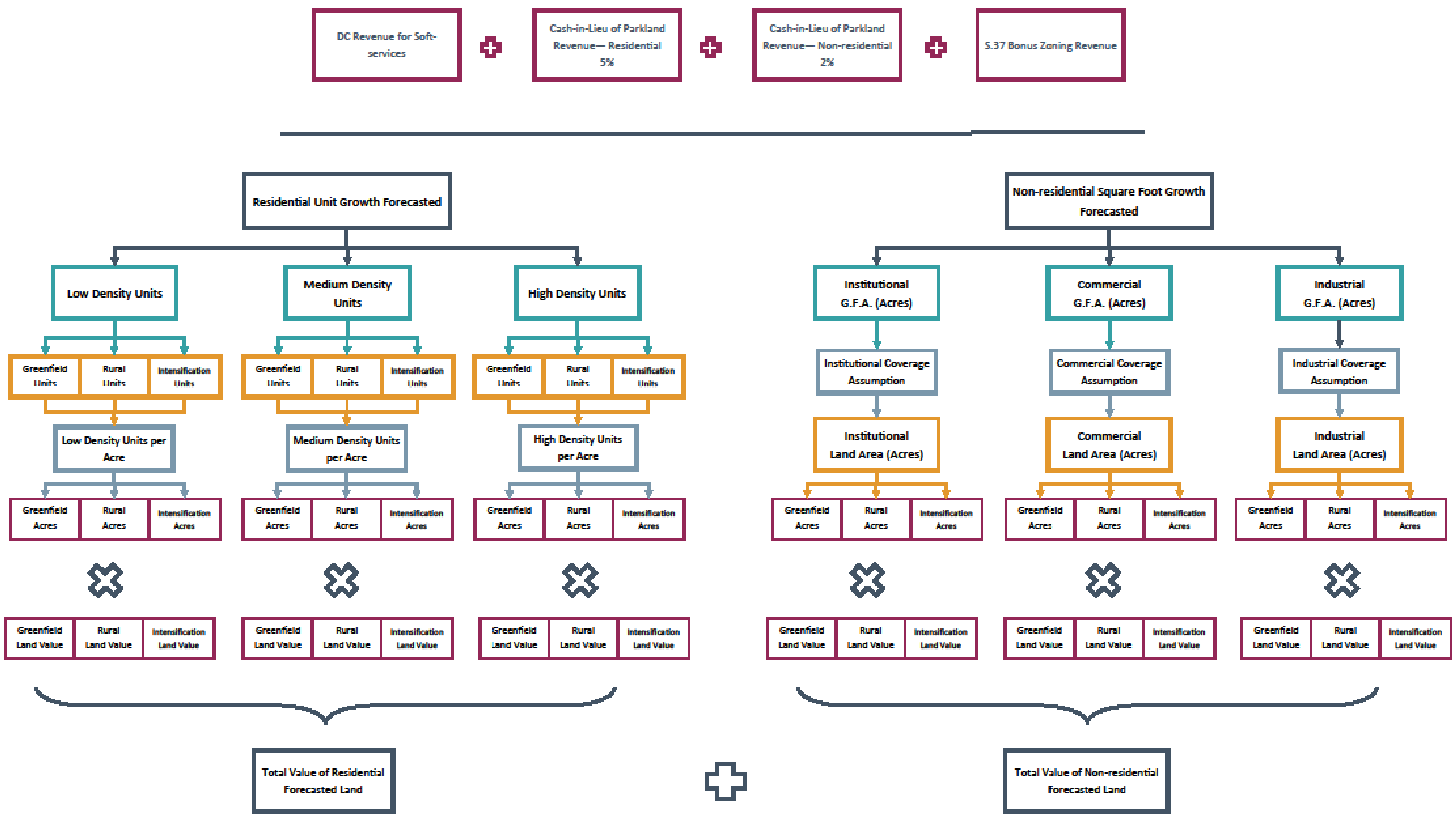
Bill 108 – New Community Benefits By-law

- **Community Benefits By-law (Sec 37 Planning Act)**
  - A municipality may impose community benefits charges (CBC) to pay for capital costs of facilities, services and matters required due to development or redevelopment
  - Proposed CBC would be for soft services previously allowed under DCA, parkland dedication and bonus zoning public benefit contributions
- **Community Benefits Strategy must be approved**
  - Consultation required
- **CBC will be capped**
  - Cannot exceed prescribed % of appraised value of land at BP
  - Owner may provide appraisal
    - Municipality can provide as well if disagreement
    - If not within 5%, a third appraisal will be obtained

Bill 108 – New Community Benefits By-law

- **CBCs must be set aside in a reserve fund**
  - Must spend or allocate 60% of the funds each year
  - "Allocate" to be determined
- **Balance in RDC fund for applicable services to be transferred to CBC fund**
  - If no CBC, then transferred to a general capital reserve for the same purpose
- **Reporting requirements to be prescribed**

Overview of the Analysis



Description of Analysis

- The attached schematic provides a "potential" approach to calculating a "municipal-wide" CBC percentage for municipalities. A description of the schematic is as follows:
  - Numerator – the top four red boxes represent the potential costs (indexed to 2019)to be considered in the calculations. These include:
    - Soft services to be removed from Development Charges (10 year capital costs)
    - Parkland Dedications for future development lands - provided 2 scenarios : 1) 5% for residential and 2% for non-residential lands 2) I ha for 300 units
    - Estimated s.37 Bonus Zoning charges (note that this use is limited outside GGH presently)
    - Also provide additional costs of approx. $1 million for CBC related studies and other costs within GGHC and $0.5-.75 million elsewhere

Description of Analysis

- Denominator – the lower segment of the schematic presents the proposed residential and non-residential development anticipated over the future 10-year period. This aligns currently with the development charge growth forecast for each municipality. This is described further as follows:
    - Residential growth has been divided between Greenfield, Rural and Intensification for low, medium and high-density units.
    - Assumptions regarding average density (i.e. units per acre) have been assigned to calculate the number of acres expected for the forecast period for each type of development.
    - The number of acres is then multiplied by the average land value per acre (for our analysis, this has been collected from MPAC data – we have taken the average value per acre for this analysis).
    - This provides a total residential property value amount for the 10-year forecast period.

Description of Analysis

- Non-Residential property values for the 10-year period has been calculated in a similar manner to residential.
- We have identified Greenfield, Rural and Intensification for this analysis (note that other categories such as Brownfield could also be included but have not been for this example).
- The DC growth forecast provides for Commercial, Industrial and Institutional square feet of buildings. Based on average land coverage (we used 25% for industrial and 35% for Commercial and Institutional for this analysis), we have estimated the number of acres associated with each of the developments (note that this approach segments large land parcels to only the portion of lands being developed).
- The number of acres is then multiplied by the average land value per acre.

Initial Calculations

- We considered different municipal situations:
  - GGH municipalities
  - Outer Rim Municipalities
  - Municipalities Well Outside GTA
- The following provides the details (residential portion) of the approach for the GGH municipality
- Subsequently, provides the outcome for the other two evaluations

Summary Analysis – Municipality#1 (Residential)

10 Year Growth in Units:
5,890

	Low Density	Medium Density	High Density
Distribution of Unit Type (%)	4%	19%	77%
Distribution of Unit Type (# of Units)	236	1,119	4,535

	Low Density			Medium Density			High Density		
	Greenfield	Rural	Intensification	Greenfield	Rural	Intensification	Greenfield	Rural	Intensification
Distribution of Unit Location (%)	79.5%	0.5%	20.0%	44.0%	0.0%	56.0%	7.0%	0.0%	93.0%
Distribution of Unit Location (# of Units)	187.0	1.2	47.0	492.0	-	627.0	317.0	-	4,218.0
# of Units Per Net Acre	9	1	9	20	0	20	40	0	58
# of Net Acres	21.0	1.2	5.0	25.0		31.0	8.0		73.0
$ per Acre	$2,623,667	$1,199,000	$3,833,000	$1,994,667	$1,199,000	$5,042,000	$1,779,667	$1,199,000	$9,746,000
Total Value of Forecasted Land Developed By Unit Location	**$55,097,000**	**$1,412,422**	**$19,165,000**	**$49,866,667**	**$0**	**$156,302,000**	**$14,237,333**	**$0**	**$711,458,000**

Total Value of Forecasted Land Developed for all Residential	**$1,007,538,422**
Total Forecasted D.C.s for Soft Services ($)	$7,393,009
Total Forecasted CIL ($) - Based on 5%/2%	$50,376,921
Total Forecasted CIL ($) - Based on 1ha/300 units	$382,748,577
Total Forecast for Bonus Zoning Revenue ($)	$20,000,000
Costs of Appraisals	$900,000
Total Revenues Collected (CIL 5%/2%):	$78,669,930
% Required for Revenue Neutrality (CIL 5%/2%):	**8%**
Total Revenues Collected (CIL 1/300):	$411,041,586
% Required for Revenue Neutrality (CIL 1/300):	**41%**

CIL Based on 1ha/300 units	Greenfield	Rural	Intensification	Greenfield	Rural	Intensification	Greenfield	Rural	Intensification
Hectares per 300 units	0.62	0.00	0.16	1.64	-	2.09	1.06	-	14.06
Acres per 300 units	1.54	0.01	0.39	4.05	-	5.16	2.61	-	34.73
CIL ($)	$4,039,485	$11,629	$1,483,243	$8,079,996	$0	$26,028,317	$4,644,871	$0	$338,461,037

Summary Analysis – Municipality #2(Residential)

10 Year Growth in Units:
7,846

	Low Density	Medium Density	High Density
Distribution of Unit Type (%)	50%	19%	31%
Distribution of Unit Type (# of Units)	3,920	1,510	2,416

	Greenfield	Rural	Intensification	Greenfield	Rural	Intensification	Greenfield	Rural	Intensification
Distribution of Unit Location (%)	65%	17%	18%	56%	13%	31%	28%	4%	68%
Distribution of Unit Location (# of Units)	2,555	669	696	849	191	470	682	96	1,638
# of Units Per Net Acre	9	1	9	20	20	20	50	50	50
# of Net Acres	284	669	77	42	10	24	14	2	33
$ per Acre	$1,133,000	$316,000	$2,410,000	$1,905,000	$316,000	$2,410,000	$1,905,000	$316,000	$2,410,000
Total Value of Forecasted Land Developed By Unit Location	**$321,772,000**	**$211,404,000**	**$185,570,000**	**$80,010,000**	**$3,160,000**	**$57,840,000**	**$26,670,000**	**$632,000**	**$79,530,000**

Total Value of Forecasted Land Developed for all Residential	**$966,588,000**
Total Forecasted D.C.s for Soft Services ($)	$60,753,203
Total Forecasted CIL ($) - Based on 5%/2%	$48,329,400
Total Forecasted CIL ($) - Based on 1ha/300 units	$105,972,106
Total Forecast for Bonus Zoning Revenue ($)	$10,000,000
Costs of Appraisals	$900,000
Total Revenues Collected (CIL 5%/2%):	$119,982,603
% Required for Revenue Neutrality	**12%**
Total Revenues Collected (CIL 1/300):	$177,625,309
% Required for Revenue Neutrality	**18%**

CIL Based on 1ha/300 units	Greenfield	Rural	Intensification	Greenfield	Rural	Intensification	Greenfield	Rural	Intensification
Hectares per 300 units	8.52	2.23	2.32	2.83	0.64	1.57	2.27	0.32	5.46
Acres per 300 units	21.04	5.51	5.73	6.99	1.57	3.87	5.62	0.79	13.49
CIL ($)	$23,833,977	$1,740,560	$13,810,264	$13,316,141	$496,931	$9,325,897	$10,696,829	$249,766	$32,501,742

Summary Analysis – Municipality #3 (Residential)

10 Year Growth in Units:
21,598

	Low Density	Medium Density	High Density
Distribution of Unit Type (%)	42%	36%	22%
Distribution of Unit Type (# of Units)	9,069	7,706	4,823

	Greenfield	Rural	Intensification	Greenfield	Rural	Intensification	Greenfield	Rural	Intensification
Distribution of Unit Location (%)	99.67%	0.33%	0.00%	97.73%	0.00%	2.27%	97.59%	0.00%	2.41%
Distribution of Unit Location (# of Units)	9,039	30	-	7,531	-	175	4,707	-	116
# of Units Per Net Acre	9	1	9	20	0	20	53	0	58
# of Net Acres	1,004	30	-	377		9	89		2
$ per Acre	$1,822,000	$124,000	$2,673,000	$1,822,000		$2,673,000	$1,822,000		$2,673,000
Total Value of Forecasted Land Developed By Unit Location	**$1,829,288,000**	**$3,720,000**	**$0**	**$686,894,000**	**$0**	**$24,057,000**	**$162,158,000**	**$0**	**$5,346,000**

Total Value of Forecasted Land Developed for all Residential	**$2,711,463,000**
Total Forecasted D.C.s for Soft Services ($)	$211,591,449
Total Forecasted CIL ($) - Based on 5%/2%	$135,573,150
Total Forecasted CIL ($) - Based on 1ha/300 units	$325,613,983
Total Forecast for Bonus Zoning Revenue ($)	$10,000,000
Costs of Appraisals	$900,000
Total Revenues Collected (CIL 5%/2%):	$358,064,599
% Required for Revenue Neutrality	**13%**
Total Revenues Collected (CIL 1/300):	$548,105,431
% Required for Revenue Neutrality	**20%**

CIL Based on 1ha/300 units	Greenfield	Rural	Intensification	Greenfield	Rural	Intensification	Greenfield	Rural	Intensification
Hectares per 300 units	30.13	0.10	-	25.10	-	0.58	15.69	-	0.39
Acres per 300 units	74.42	0.25	-	62.01	-	1.44	38.75	-	0.96
CIL ($)	$135,595,244	$30,628	$0	$112,973,535	$0	$3,851,348	$70,610,335	$0	$2,552,893

Summary Analysis – Municipality #4 (Residential)

10 Year Growth in Units:
17,420

	Low Density	Medium Density	High Density
Distribution of Unit Type (%)	34%	23%	43%
Distribution of Unit Type (# of Units)	6,007	3,947	7,466

	Greenfield	Rural	Intensification	Greenfield	Rural	Intensification	Greenfield	Rural	Intensification
Distribution of Unit Location (%)	85%	0%	15%	52%	0%	48%	10%	0%	90%
Distribution of Unit Location (# of Units)	5,076	-	931	2,052	-	1,895	760	-	6,706
# of Units Per Net Acre	9	0	9	20	0	20	65	0	65
# of Net Acres	564		103	103		95	12		103
$ per Acre	$4,916,000		$5,215,000	$2,257,000	$0	$7,458,500	$1,612,000	$0	$9,702,000
Total Value of Forecasted Land Developed By Unit Location	**$2,772,624,000**	**$0**	**$537,145,000**	**$232,471,000**	**$0**	**$708,557,500**	**$19,344,000**	**$0**	**$999,306,000**

Total Value of Forecasted Land Developed for all Residential	**$5,269,447,500**
Total Forecasted D.C.s for Soft Services ($)	$210,520,170
Total Forecasted CIL ($) - Based on 5%/2%	$263,472,375
Total Forecasted CIL ($) - Based on 1ha/300 units	$945,686,714
Total Forecast for Bonus Zoning Revenue ($)	$20,000,000
Costs of Appraisals	$900,000
Total Revenues Collected (CIL 5%/2%):	$494,892,545
% Required for Revenue Neutrality	**9%**
Total Revenues Collected (CIL 1/300):	$1,177,106,884
% Required for Revenue Neutrality	**22%**

CIL Based on 1ha/300 units	Greenfield	Rural	Intensification	Greenfield	Rural	Intensification	Greenfield	Rural	Intensification
Hectares per 300 units	16.92	-	3.10	6.84	-	6.32	2.53	-	22.35
Acres per 300 units	41.79	-	7.67	16.89	-	15.60	6.26	-	55.21
CIL ($)	$205,451,438	$0	$39,974,192	$38,131,564	$0	$116,368,760	$10,086,821	$0	$535,673,939

Summary Analysis – Upper Tier (Residential)

10 Year Growth in Units:	52,754

	Low Density	Medium Density	High Density
Distribution of Unit Type (%)	36%	27%	36%
Distribution of Unit Type (# of Units)	19,232	14,282	19,240

	Low Density			Medium Density			High Density		
	Greenfield	Rural	Intensification	Greenfield	Rural	Intensification	Greenfield	Rural	Intensification
Total Value of Forecasted Land Developed By Unit Location	**$4,978,781,000**	**$216,536,422**	**$741,880,000**	**$1,049,241,667**	**$3,160,000**	**$946,756,500**	**$222,409,333**	**$632,000**	**$1,795,640,000**

Total Value of Forecasted Land Developed for all Residential	**$9,955,036,922**
Total Forecasted D.C.s for Soft Services ($)	$70,527,014
Costs of Appraisals	$900,000
Total Revenues Collected:	$71,427,014
% Required for Revenue Neutrality	**1%**

Summary of Analysis – GGH Municipality

Using CIL 5%/2%			
Municipality	% of Residential Property Value	% of Non-Residential Property Value	Combined % of Total Property Value
Municipality #1	13%	3%	7%
Municipality #2	9%	3%	7%
Municipality #3	12%	2%	7%
Municipality #4	8%	2%	6%
Upper Tier	0.72%	0.04%	0.44%

Using CIL 1ha/300units & 2%			
Municipality	% of Residential Property Value	% of Non-Residential Property Value	Combined % of Total Property Value
Municipality #1	20%	3%	11%
Municipality #2	22%	3%	16%
Municipality #3	18%	2%	10%
Municipality #4	41%	2%	29%
Upper Tier	0.72%	0.04%	0.44%

Note that the Upper Tier % is in addition to the Local %

Summary of Analysis – Outer Rim Municipality

Using CIL 5%/2%			
Municipality	% of Residential Property Value	% of Non-Residential Property Value	Combined % of Total Property Value
Municipality #1	8%	3%	7%
Municipality #2	11%	6%	10%
Municipality #3	10%	6%	10%
Municipality #4	10%	5%	9%
Municipality #5	7%	3%	7%
Municipality #6	13%	4%	10%
Upper Tier	17%	4%	14%

Using CIL 1ha/300units & 2%			
Municipality	% of Residential Property Value	% of Non-Residential Property Value	Combined % of Total Property Value
Municipality #1	9%	3%	7%
Municipality #2	11%	6%	11%
Municipality #3	11%	6%	11%
Municipality #4	12%	5%	12%
Municipality #5	8%	3%	8%
Municipality #6	13%	4%	10%
Upper Tier	17%	4%	14%

Note that the Upper Tier % is in addition to the Local %

Summary of Analysis – Municipalities Well Outside GTA

Using CIL 5% for Residential/2% for Non-Residential			
Municipality	% of Residential Property Value	% of Non-Residential Property Value	Combined % of Total Property Value
Municipality #1	9%	11%	9%
Municipality #2	6%	4%	6%
Municipality #3	6%	3%	5%
Municipality #4	9%	6%	9%
Municipality #5	8%	2%	2%
Municipality #6	9%	4%	7%
Municipality #7	8%	9%	8%
Municipality #8	11%	3%	8%
Upper Tier	0.17%	0.01%	0.04%

Using CIL 1ha/300units for Residential & 2% Non-Residential			
Municipality	% of Residential Property Value	% of Non-Residential Property Value	Combined % of Total Property Value
Municipality #1	9%	11%	9%
Municipality #2	7%	4%	7%
Municipality #3	8%	3%	7%
Municipality #4	8%	6%	8%
Municipality #5	6%	2%	2%
Municipality #6	9%	4%	8%
Municipality #7	7%	9%	7%
Municipality #8	13%	3%	9%
Upper Tier	0.17%	0.01%	0.04%

Note that the Upper Tier % is in addition to the Local %

Observations and Comments

- For GGH sample municipalities, the CBC percentage of property value ranges from a combined upper/local municipal total of 10%-14% for residential lands and 2%-3% for non-residential lands using lower parkland dedication assumptions. This raises to 19%-42% for residential lands using higher parkland dedication assumptions
- Highest percentages are in municipalities where growth units are predominantly high density
- The variation in values are less for the outer rim and further out municipalities. This is a combination of overall lower residential densities along with lower land values
- Do not recommend a blended rate for res/non-res lands as this approach places to much burden on the non-residential lands and results in non-res subsidizing res

Observations and Comments

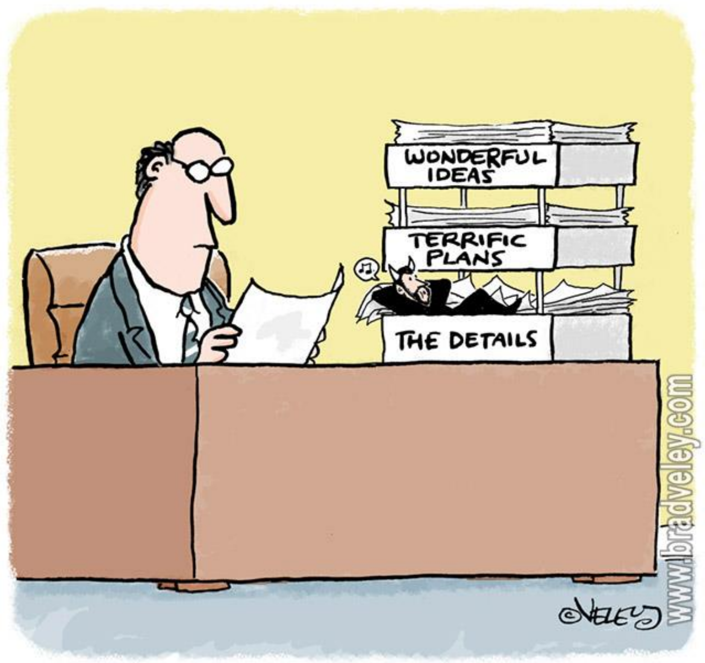
- The above analysis provides for the following limitations:
  - Property values have been drawn from MPAC data. In some cases the sample size was very small and in other instances, estimates were required to establish land values.
  - Eligible capital costs are yet to be defined in the Regulations and hence additional costs may be excluded or included. Analysis has provided for an annual property value report prepared to assist in charging the CBC rate. A provision has also been made for study costs and for additional appraisals .
  - Valuations for intensification are based on vacant land data where available. For redevelopment, no adjustments have been made. Similarly, for Brownfield redevelopment, no adjustments have been made at this time.
  - The analysis has not considered how mixed-use development would be included in the calculations.

Observations and Comments

- Questions arising from the analysis include:
  - Will the definition of capital costs be the same are presently provided in the DCA?
  - Given the ranges provided above, will the CBC maximum rates be set by individual municipality or by the maximum calculated for a County or Region?
  - Should the calculations use a 10-year planning horizon similar to the DC background studies?
  - Establishing average costs per acre for developments may come with challenges. Properties below the average will appeal thus creating a revenue loss to the municipality.
  - Service levels are presently constrained by the historic 10-year service standard calculation – how is this to be dealt with in the future?
  - Cost for parkland development in DC assumes a local service share of the costs…will this be considered in establishing the %

Part 3: Tying it all together

The Devil is in the Details



Community Benefits Charge

Considerations for Cost of Service

- Capital infrastructure
- In-kind contributions
- Financing costs
- Cost for studies
- Administrative burden
- Etc.

Considerations for Value of Land

- Location, location, location
- Density
- Timing
- Demographics
- Economic environment
- Etc.

Unintended Consequences

- The cap **must** be anchored in the costs to service growth. If it is not, there are a number of risks to municipalities:
  - Not enough revenue to provide growth-related community benefits
  - Decreases in levels of service
  - Winners and losers between and within municipalities
  - Inequities between neighbourhoods
  - Indirect tax

Key Messages

- Growth should pay for growth
- Diversity of the municipal sector
- Take time to get it right

Resources

- Visit MFOA website's More Homes, More Choice Act Hub
- Follow us on Twitter
- Subscribe to the MFOA newsletter
- Contact the MFOA policy team

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