

*Submission by Amy Kempster for the Greenspace Alliance, for Planning Committee's meeting of May 13, 2014, item 9.*

The Greenspace Alliance firmly believes that growth should pay for growth and this submission is in that spirit.

We are pleased to see the increases in the development charges which should ensure that less of the burden of growth will fall on the existing taxpayers. However we are very disturbed that unlike in 2003 and 2009 there was no involvement of the general public or of community organizations which might speak for them, while the development industry was consulted. This lack of public consultation of all those affected financially is disturbing, given promises to the contrary.

We are also concerned that there was not more effort placed on trying to assure that development at one end of the city does not pay for capital expenses at the other end. This can be assured through isolating separately the actual costs for the different suburban areas. We are especially concerned that, as in 2009, the promised isolation of actual costs for Kanata West was ignored. Placing all the suburbs in one category "urban outside the Greenbelt" hides the differential costs which probably exist, especially for roads.

We note that in Appendix G there is discussion of some aspects of the methodology. Since there is a level of service cap (on the capital expenditures which can be included) of the most recent 10 year average service level, improvements in service levels cannot be funded from development charges, at least theoretically. This brings into question what benefit to existing population exists if there is no improvement in service level. One might also argue that in the case of roads, since the addition of more capacity outside the Greenbelt, may result in frequent cases in more congestion and a lower level of service inside the Greenbelt, thus no benefit to those living inside the Greenbelt may exist, in fact they may suffer a dis-benefit.

We encourage reducing the amounts deducted for the "benefit to existing population" by whatever methods have been accepted and seem logical. The practice of some municipalities of confining the deduction for benefit to existing population to expenditures beyond the service level cap should be followed to a greater extent by Ottawa than we believe has been done. We also note that the 10% reduction of costs for some items (particularly transit) can be thought to cover all or a portion of the benefit to existing. In essence we believe that this section of the methodology offers more flexibility to ensure that growth pays for growth and should be so used to the extent feasible. Therefore we also welcome the use of transit users for calculating the benefit to existing in the case of transit.

We wonder whether all arterials should be included in the category "city-wide" especially if they do not cross the greenbelt. We seem to remember that unless there was work planned within the Greenbelt they were excluded from charges inside the Greenbelt in 2003.

We object to the exclusion of child-care and affordable housing capital costs from the charges. It is not justified since there are long waiting lists for both, and we understand the legal problem may be resolved. (\*)

We conclude by suggesting that the city encourage the Association of Municipalities of Ontario to again study the Development Charges Act in order to recommend changes to it so that more of the cost of growth can be assigned to growth.

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(\*) For the issue referred to, see Don Stewart's comments to [Matthew Pearson in the Citizen of 5 May 2014](#).