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Sent: Friday, January 10, 2025 11:55 AM

To: Corrina Giles <cgiles@thebluemountains.ca>; Kyra Dunlop <kdunlop@thebluemountains.ca>; Carrie Fairley <cfairley@thebluemountains.ca>; Adam Smith <asmith@thebluemountains.ca>

Cc: Patrick Crosby <patrick.crosby@greatgulf.com>

Subject: Great Gulf/ TOBM - Allocation Policy Deputation Materials

Great Gulf

Re: Allocation Policy – Option 1

Dear Mayor and Members of Council,

Thank you for considering this deputation regarding the proposed Allocation Policy on today's COW Agenda.

Ask:

We ask that Council endorses **Option 1**, which would provide an exemption to the Allocation Policy for those developments subject to DC Agreements pursuant to Section 38 and Section 44 of the Development Charges Act (collectively known as "Front Ending Agreements").

Discussion:

These Front Ending Agreements are essential tools used by almost all municipalities to finance much-needed infrastructure. Option 1 ensures that these tools remain available to the Town of the Blue Mountains.

In their assessment, Town staff incorrectly state that the concern with Option 1 is "allocation would be provided to these developments as has been in the past whereby it is simply a confirmation of system capacity and can be done at any time."

To be clear, by exempting DC Front Ending Agreements from the Allocation Policy the town is not fettering with its authority under the Planning Act such as Draft Plan Approval or Zoning By-Laws or creating a loophole to assign Allocation.

We further disagree with Staff's recommendation of **Option 2**. Town staff state, "This approach may still create a challenging risk environment for developers in executing front-ending/credit agreements, recognizing these agreements would preclude the assigning of allocation." We believe that this Option would, in fact, create such risk that the use of these Front Ending Agreements would be eliminated, leaving the Town unable to use one of the most important infrastructure financing tools in the province. Quite simply, the Town cannot expect someone to invest millions of dollars for infrastructure in exchange for "points" and not a clear commitment to the allocation their investment funded.

Those developments that pay for much needed upgrades to the Town infrastructure should not have to compete for the capacity those investments create.

Conclusion:

For these reasons, Great Gulf is requesting that the Town accepts **Option 1** to ensure that these vital tools remain available to the Town.

Sincerely,

Ken Hale



Kenneth Hale

Vice President, Land Development

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Please do not feel obliged to reply to this email outside of your normal working hours.