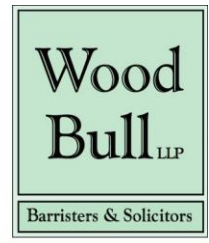


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MUNICIPAL, PLANNING & DEVELOPMENT LAW

4 November 2020

Sent via E-mail ([regional.clerk@peelregion.ca](mailto:regional.clerk@peelregion.ca) / [maggie.wang@peelregion.ca](mailto:maggie.wang@peelregion.ca))

Members of Council  
Peel Region  
10 Peel Centre Drive, Suite A and B  
Brampton, ON L6T 4B9

Maggie Wang  
Manager, Financial Policy and Development  
Financing  
Peel Region  
10 Peel Centre Drive, Suite A and B  
Brampton, ON L6T 4B9

Dear Members of Council:

**Re: Peel Region 2020 Development Charges By-law Update  
Submissions by Morguard Investments Limited**

We are writing on behalf of Morguard Investments Limited (“Morguard”) with respect to the 2020 Development Charges Background Study and the proposed development charges by-law update (the “Proposed DC By-law”) for the Region of Peel (the “Region”).

Our review of the Proposed DC By-law indicates that a fundamental revision is being proposed to the rules relating to demolition credits. As indicated in the presentation at the public meeting held on 8 October 2020, staff are recommending the following policy change relating to demolition credits:

*To be consistent with best practices in other municipalities, including Peel’s local municipalities, the Region would like to add a time limit for demolition credits.*

*For demolition of non-residential buildings/structures –the credit is available within 10 years from the date the demolition permit was issued.*

This policy change is found in Section 10(3)(b) of the draft Proposed DC By-law.

The current Development Charges By-law do not have any corresponding restriction, which means that credits that are “banked” can be applied towards future redevelopment without any time restrictions. The ability to apply demolition credits to future redevelopment is fair, and Morguard had expected that it could apply its “banked” credits to future development on Morguard’s lands.

Unfortunately, Morguard did not learn of this proposed change in the rules related to demolition credits until very recently and has not been able to discuss possible resolution of the matter with Region staff.

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4 November 2020

Morguard discovered a similar issue with respect to the City of Brampton's new development charges by-laws, enacted by the City of Brampton in 2019 and appealed by Morguard, and we are in discussions with the City of Brampton to resolve similar concerns with the language.

Morguard would welcome the opportunity to discuss this matter further with Region staff, and requests a meeting with Region staff prior to any Council consideration of the Proposed DC By-law to discuss Section 10(3) of the Proposed DC By-law in the context of the credits that have already been accumulated by Morguard.

Morguard looks forward to continuing to work with the Region to address its concern relating to the Proposed DC By-law.

Yours very truly,

**Wood Bull LLP**



Dennis H. Wood

c. Client