

# London Development Institute

May 10, 2013

City of London  
300 Dufferin Avenue  
London, Ontario  
N6A 4L9

Attn.: Chair and Members Strategic Priorities and Policy Committee

**Re: Development Charges (DC) Policy Review, DC Area Specific Charges,  
May 13, 2013**

Dear Chair and Members of the Committee,

The LDI does not support the recommendation before you this evening regarding the policy amendments with respect to the Development Charge Policy change to an Area Specific Stormwater Management (SWM) Charge from the current City Wide charge.

The Staff report includes the rationale for the current Uniform Municipal Wide Charge being, Growth Cost Averaging, Administrative Simplicity and Financial Flexibility that has worked well in the City of London to provide some of the lowest cost housing in the Province and to create an even playing field for new development City wide. We support the continuation of the current DC policy to charge SWM Facilities on a City Wide basis.

However, the Staff report is recommending changing the City Wide charge to an area specific charge and LDI's position opposing this change is outlined in the following points.

**Area Rating**

- The current City wide SWM rate averages stormwater management costs across the City to the benefit of the whole of the City by improving the water quality of the Thames River
- The City of London promotes the "system approach" for stormwater management and its cost should be shared on a City wide basis
- The proposed area rating system will increase the price of new homes outside of the Central Thames Area (CTA)
- Storm ponds outside the CTA hold back stormwater to allow queuing time for water in the CTA to get to the river as part of a systems approach and the SWM charge should be based City wide for this benefit
- New core area quality control ponds could be used as amenity space in new developments such as the South Street Hospital Lands or the London Hydro lands redevelopment
- New development outside of the CTA are required to pay a SWM DC charge and pay for onsite storm water manage works as Part of the

Private Permanent System (PPS) policy in the City and this should be required in the CTA

- A SWM DC charge in the CTA could provide for stormwater quality pond construction when the combined sewer system is rebuilt in the core area

We request that the Committee instruct Staff to continue to engage in discussions with the industry to resolve our outstanding concerns before approving any change to the existing rational and philosophy for the City Wide SWM charge.

Sincerely,

**London Development Institute**



**Jim Kennedy**  
**President, LDI**

- cc LDI Members
- cc Martin Hayward, CFO
- cc John Braam, City Engineer
- cc Lyn Townsend, Townsend & Associates
- cc Art Zuidema, City Manager