

April 17, 2025



GEORGIAN TRIANGLE DEVELOPMENT INSTITUTE

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Comments related to the SCAP 24 Month Review

The following are comments compiled from GTDI members related to the SCAP 24-Month Review.

1. The GTDI requests that there be a clear mechanism in place that allows developments that enter into a Development Charge Credit Agreement or Front-Ending Agreement to be exempt from SCAP. Having developers/landowners front end important infrastructure is one of the most valuable tools that any municipality has to facilitate the advancement and construction of new infrastructure and in our experience the current iteration of SCAP has prevented the Town from being able to guarantee any sort of servicing allocation in exchange for DC Credit/Front Ending Agreements which has prevented these types of agreements from being viable from the development community.
2. Imposed criteria are often simply not applicable and therefore effectively penalize a given proponent simply due to geographic location and/or a land use proposal in accordance with approved OP land use designations and zoning. Examples are: A4, A5, A6, B4, C1, C2, E3, E4, E5, F1, F2.
3. Related to point 1: A one-size-fits-all approach is ultimately inappropriate as a development assessment and review tool. It is no surprise that there are so few examples of proposals achieving scores above 60% and why worthwhile positive development proposals that represent good planning can score below 50%. The SCAP tool fails to account for the size of the project, the location of the project, land use attributes of the project, and, as noted, on most projects, there are several criteria simply "not applicable". Suggest the application of the SCAP be revised so that categories that are not applicable to a given project are removed from the total possible points, thus not penalizing that site for the not applicable category. For example, with category A6, if a site isn't contaminated, then that category is n/a and the total possible points is revised from 95 points down to 92.5 points, thus not penalizing a developer for trying to develop a site that is not contaminated.
4. With some criteria having a sliding scale (for example 0-5), assignment of a score is subjective. Examples are B1, B2, B3, C1, C2, C3.

5. In our experience the current iteration of the SCAP and the one size fits all approach has favoured traditional greenfield development over infill/intensification development. Both types of development are important and should be treated fairly. Greenfield development is able to score points for categories such as infrastructure connections/improvements, public parks, mix of housing types etc. whereas infill/intensification type projects, which are often more challenging to get off the ground financially to begin with, are then also further penalized by the current iteration of the SCAP as they struggle to score points in the Greenfield oriented categories while many other categories remain not applicable yet they still get penalized for not scoring points in them.
6. Application of SCAP scores has been raised or questioned by Council members on several occasions.
7. Assessing proposed developments in a schema that has expectations and inferred demands with categories that are outside of the Planning Act remains a concern eg. C3, D2, D3, most of E, F3. Such criteria rely on standards that are not subject to legislated authority (needs to be double-checked).
8. The GTDI continues to request that the SCAP be abolished once the ultimate water treatment plant comes online in 2029/2030.

On behalf of the GTDI Board of Directors



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cc: Summer Valentine, Director, Growth & Development