



AMO's Submission to Proposed Amendment to O. Reg 232/18: Inclusionary Zoning

AMO Submission to the Ministry of Municipal Affairs and Housing on:

ERO 019-6173

December 9, 2022

Preamble

The Association of Municipalities of Ontario (AMO) is a non-profit, non-partisan association that represents municipal governments across Ontario. Together with our members, we address common challenges facing our residents and provide advice to the government about solutions to them. AMO has been actively involved in housing and homelessness advocacy for years, as Ontario's 444 municipal governments are responsible for building strong, complete communities, of which housing – both home ownership and rentals – is a key component.

Housing affordability and building supply is a challenge all Ontarians share. There is much that can be done collectively by working together to increase housing supply, diversify the mix and increase affordability. Solving the housing crisis will require an all-of-government approach by all three orders of government and the development industry.

Introduction

AMO appreciates the opportunity to provide comments on several consultations related to Bill 23 – *More Homes Built Faster Act, 2022*. These are in addition to the [written submission to Bill 23](#) AMO provided to the Standing Committee on Heritage, Infrastructure and Cultural Policy.

Despite the Bill's passage on November 28, municipal governments remain concerned that the legislation:

1. shifts the cost burden of growth
2. undermines planning and community livability
3. exacerbates risks to the environment and human health.

On November 30 AMO was pleased to see the government's response to AMO's preliminary analysis of the Bill which indicated a need for a transfer of up to \$1 billion a year in costs from private sector developers to property taxpayers without any likelihood of improved housing affordability. Our focus will now shift towards making sure the housing pledges and targets are feasible and reasonable given historical data. To tie funding to unreachable targets and narrowly defined "housing enabling infrastructure" are details we look forward to discussing more.

In the meantime, AMO is asking the province to work with all of its housing partners to take an integrated approach to environmental, social, and economic policy that allows Ontario to take its place ahead of competing jurisdictions.

To that end, AMO respectfully submits comments on various consultations related to Bill 23 and the More Homes Built Faster Plan.

Proposed Amendment to O. Reg 232/18: Inclusionary Zoning (ERO 019-6173)

Inclusionary zoning is a critical tool in the municipal toolkit to facilitate more affordable housing in communities. AMO does not support the proposed changes to this regulation. It would work best to continue to afford municipal governments the flexibility to meet local needs and circumstances to enact viable and effective inclusionary zoning by-laws. This includes the discretion to establish an affordability period, to determine the percentage of total units to be set aside as affordable, and to develop an approach to determining affordable prices/rents for inclusionary zoning units.

Otherwise, it will reduce the adoption of inclusionary zoning by-laws in Ontario's municipalities, thereby counter to the shared municipal-provincial goal of increasing affordable housing units, both rental and home ownership.

Further, the application of inclusionary zoning should be broadened in scope to make it feasible for smaller and rural communities without major transit areas to use this tool within their local context on a scale that is appropriate to their size and geography.

Conclusion

On behalf of municipal governments across Ontario, thank you for your consideration of the comments provided in this submission.