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December 9, 2022

The Hon. Steve Clark  
Minister of Municipal Affairs and Housing  
17th Floor - 777 Bay Street  
Toronto, ON M7A 2J3

(sent via email only)  
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**Re: Proposed Amendment to O. Reg 232/18: Inclusionary Zoning  
ERO Number 019-6173**

Dear Minister Clark,

The City of Cambridge is providing this submission in response to the proposed amendments O. Reg 232/18: Inclusionary Zoning, posted for comment on the Environmental Registry of Ontario by the Ministry of Municipal Affairs and Housing. Inclusionary Zoning (IZ) has been described as applying to 5% of units and for a 25 year time horizon.

Please see below comments:

The changes to the Regulation governing IZ do not remove the permissions for IZ policies but do place restrictions on IZ which will impact the ability of IZ programs to provide affordable units in some scenarios. The 5% upper threshold limits opportunities to create a significant number of affordable IZ units in strong market areas and to increase IZ requirements over time as markets strengthen and have the capacity to absorb the increase.

Staff feel the decision to impose a 25 year limit on the length of affordability removes the ability for municipalities to work towards sustained affordability. This provides a delayed impact to the housing affordability need.

Staff time and resources will need to be directed towards trying to retain and/or repurpose IZ affordable units in the system rather than directing those resources to bringing new affordable units online.

The new definition for affordability and the lack of clarity on the definition for affordable ownership is insufficient to address the majority of those in need of affordable housing. Having the affordability of a unit based on market rates does not acknowledge that the ability to afford a unit is dependent on household income more so than the average market values or rents and does not reflect the workforce at large.

If IZ units are included within the defined classes of affordable units in the Development Charge Act then developments with IZ units would have reduced parkland and Development Charge requirements (prorated by the number of affordable units in the development). This would have a positive effect on the financial feasibility of Inclusionary Zoning by reducing the overall cost of development for the IZ units.

Thank you for the opportunity to comment.

Yours truly,



Lisa Prime  
Chief Planner