



AMO's Response to Proposed Regulatory Amendments

Proposal Numbers: 22-MMAH008 and 22-MMAH009

April 6, 2022

Proposed Regulatory Amendments 22-MMAH008 and 22-MMAH009

22-MMAH008 Development Charges

DC background study variance reports – The proposal amends existing reporting requirements for Development Charge background studies to account for annual variances between projections. If further provincially regulated reporting on the use of development charges will help developers and the public understand how these dollars are used year in and year out, AMO has no objection. This is assuming a straightforward interpretation of the terms “variance” and “service” is in accordance with the submission put forward by the Municipal Finance Officers Association.

22-MMAH009 Community Benefits Charges and Parkland Dedication

Website reporting – To be clear, the information to be regulated is already publicly available. Municipalities are a transparent and accountable order of government. Municipal financial information is readily available to the public. Council agendas, documents and decision making is also readily available to the public.

Provincial regulation of municipal website design, to add community benefit charges and parkland dedication information, is entirely within provincial prerogative. However, AMO cautions against an overly prescriptive approach. Municipalities offer a broad range of services and information on their websites. These are tailored to local circumstances and needs. Such a regulation must not displace other key information which helps the public access key public services, such as housing for example. Regulation should not be undertaken in a way that complicates the public's access to critical information.

Parkland plan reporting – The information to be regulated is already publicly available. However, if further provincial regulated reporting on the use of parkland dedication levies will help developers and the public understand how these dollars and lands are used, AMO has no objection.

AMO thanks the Ministry for the opportunity to comment.