



Bill 109, *The More Homes for Everyone Act, 2022*

AMO's Remarks to the Standing Committee on the
Legislative Assembly

April 11, 2022

Remarks by Monika Turner, Director of Policy, Association of Municipalities of Ontario (AMO)

Thank you for the opportunity to speak with you today about Bill 109, the *More Homes for Everyone Act*.

My name is Monika Turner. I am the Director of Policy for the Association of Municipalities of Ontario (AMO). I am joined today by two of AMO's Senior Advisors, Amber Crawford and Michael Jacek.

Our association 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 has become a top-of-mind issue, regardless of whether it is an urban city or small, rural, and remote community. These challenges will not be solved by one-size-fits-all solution.

That is why we appreciate the government including separate consultations on missing middle and gentle density, and the unique housing needs for rural and northern Ontario municipalities.

Throughout the province's housing consultations, AMO has consistently advocated for a comprehensive and integrated approach to housing affordability.

Our latest housing paper, *A Blueprint for Action* – released in February 2022 – makes nearly 90 recommendations for all orders of government, and partners in the development, non-profit and co-operative housing sectors, to improve affordability, diversify the housing mix, and increase supply.

Municipal governments are a mature order of government and have a key part to play in improving planning and development in our communities.

However, the housing market in Ontario is truly complex including factors that affect supply and factors that drive demand. Housing affordability is equally complex because it is affected by both escalating prices and lagging incomes.

There is very little municipal governments can do about demand.

We cannot change the fact that a considerable segment of the housing market is seen as a financial investment rather than places to live.

Municipalities do not control interest rates and we do not control the provincial approvals that can often hold up construction.

Therefore, to make a meaningful impact to housing affordability, everybody involved must be at the table and contribute to solutions.

The province has been clear that Bill 109 is part of a much larger process. We agree.

This makes sense as this problem has not happened overnight, and it will not be solved immediately either. A new collective mindset for transformative change is required.

The province did **not** implement every Housing Affordability Task Force report recommendation in this bill, and we appreciate that.

Recognizing that the province intends to use the report as a roadmap going forward, the municipal sector needs to be well represented at the Housing Supply Working Group and be part of those future directions.

With the time remaining we would like to present a few general thoughts for the Committee's consideration on Bill 109.

Overall, we have some concerns that the proposed legislative and regulatory changes will give municipal governments more responsibility, transfer risk and create a more punitive planning regime that may have unintended consequences and may not achieve the desired outcomes.

We are also concerned that the proposed changes could give the Ministry additional powers related to the *Planning Act* that may reduce the role of local councils and inhibit sound planning and development practices.

Municipalities want to make sure approval processes are effective and timely. Continuous improvement is supported.

Measures in the Bill that support timely approvals and that reflect the aspirations of communities can be helpful.

However, there will be increased administrative burden that will stretch municipal government capacity to implement, especially in smaller communities.

The initiative could benefit from metrics that measure the success of these initiatives to evaluate their effectiveness based on evidence and outcomes.

We are also concerned that the legislation does not ensure new development will be supported with sufficient community services and infrastructure capacity- to grow. We need schools and hospitals to keep pace with growth

A long-standing principle of municipal governments is, and continues to be, that growth must pay for growth.

Some proposals including the July 1, 2022, deadline to delegate site plan control to staff under the *Planning Act* is likely to be problematic for communities that have not already delegated this authority.

We would encourage the Committee to move the date to December 31, 2022, to allow for time to transition, and recognize the upcoming municipal election.



Finally, the gradual fee refunds required for applicants coming into place January 1, 2023, for site plan applications and zoning by law applications, may also have unintended consequences.

These fees are often charged on a cost-recovery basis - and would leave current taxpayers responsible for covering the difference. It will also decrease revenues in departments that are already under resourced with tight budget constraints.

Municipal governments are mindful that the steps to address the housing crisis in Ontario will not be easy or simple. We commend the government, legislature, and this Committee for its effort to tackle this issue.

AMO and our member municipal governments look forward to being actively involved in the dynamic, long-term work needed to address all aspects of the housing challenges ahead.

That concludes our presentation, and we are happy to answer any questions.