

Written Submission to Standing Committee on Heritage,  
Infrastructure and Cultural Policy

Regarding

Bill 23, More Homes Built Faster Act, 2022

November 17, 2022

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**RE: Bill 23, More Homes Built Faster Act, 2022 Submission**

On behalf of The Blue Mountains Attainable Housing Corporation, I would like to commend the province on its efforts to take action to address the housing supply shortage with Bill 23. The bill takes important steps to help expand the supply of affordable and attainable housing but falls short in being able to address the unique and diverse housing needs of all communities, particularly those of small urban and rural communities outside of the Greater Golden Horseshoe such as The Blue Mountains.

As the second-fastest growing municipality in Ontario, The Blue Mountains does not necessarily have a problem building housing. Instead, it has a problem building the right kind of housing. There is a critical shortage of purpose-built rental and entry-level ownership housing. With a population of 9,400 full-time residents and an extensive part-time and seasonal population, only 59 percent of private dwellings are occupied by usual residents of which only 13 percent are rented. There are very few homes available for purchase under \$1 million and much of the rental housing stock is used for short-term rentals.

In 2013, the Town had the foresight to establish The Blue Mountains Attainable Housing Corporation as a wholly owned independent not-for-profit corporation with the mandate to increase housing options to help people live and retire in the community where they work. We are working on two key initiatives. The first is the Gateway Project, a mixed-income and mixed-use attainable workforce rental project being developed in partnership with the Town. The second is a partnership with a developer to provide up to 25 percent of units in their private development as attainable housing.

What makes us unique is that we focus on meeting the housing needs of the moderate-income workforce who are locked out of the private market. As we do not fit into the traditional housing delivery framework, we are constrained by the lack of funding from all levels of government for workforce housing and the lack of planning and other tools available to small urban and rural communities to meet housing targets.

We generally support the following measures contained in the bill:

- Streamlined and faster development processes along with development charge exemption and tax measures for non-profit, affordable and attainable housing, and inclusionary zoning units, which could lower capital and operating costs and make more projects viable, subject to changes in definitions.
- As-of-right permissions for secondary suites that should remove some barriers to new, more affordable homes, subject to limits on their use as short-term and seasonal rentals and the provision of better education and supports for small landlords.
- Exploration of a new rent-to-own home financing model as a pathway to ownership for first-time homebuyers, newcomers, and others.

The bill, however, should better consider the unique and diverse needs of communities and offer new tools and investments to ensure the right kind of housing can be built as outlined below.

### **Defining affordable and attainable housing**

Local governments should be able to define affordable and attainable housing based on local needs as the standardized approach proposed in the bill may not work for all communities. For example, the definition for an owned affordable unit is a price that is no greater than 80 percent of the average purchase price. Using the average value of owned dwellings for The Blue Mountains of \$1.2 million in the 2021 census, the affordable price would be \$960,000. This is clearly not affordable.

### **Inclusionary zoning for small urban and rural communities**

Inclusionary zoning is a proven tool to create much needed affordable and attainable housing but is not available to all communities in Ontario. There is an opportunity to expand and adapt existing inclusionary zoning provisions to also work for small urban and rural communities. There is an opportunity to pilot a housing credit system that would allow developers flexibility to meet inclusionary zoning targets outside of a single development, while providing smaller municipalities with a tool to achieve more ambitious attainable housing goals. However, the inclusionary zoning cap should be lifted from 5 percent to better reflect local needs and priorities.

### **Ensuring homes built with public incentives are affordable**

While lower taxes and reduced regulatory requirements may lead developers to offer homes at less than current market rates, there is nothing in the bill that prevents them from continuing to charge what buyers and renters are willing to pay or the units being used for short-term rentals. Measures are needed to require that incentivized units be subject to price and rental controls so that these units are provided at affordable prices and remain affordable in perpetuity.

### **The need for additional investment in affordable and attainable housing**

The bill does not address the need for new investment in affordable and attainable housing by all orders of government, which is increasingly important given inflationary and interest rate pressures. The bill also undermines existing municipal programs by removing housing services as a service for which a development charge may be imposed. There is an opportunity to pilot new funding programs to support workforce housing such as the Gateway Project and it is suggested that housing services for purposes of development charges be reinstated.

In closing, housing legislation should centre on the housing needs of the people who call Ontario home. We urge you to consider our comments and move quickly to provide new tools to small urban and rural communities and invest in attainable workforce housing to support the economic health, vitality, and sustainability of all communities.

Sincerely



Jennifer Bisley  
Executive Director