

### **ABOUT OUR GROUP:**

HamiltonForward was formed as an advocacy group in April 2018 just before the Hamilton Downtown Secondary Plan was implemented to represent concerns from pro-growth and pro-housing Hamiltonians. Since then, our group has formed a board of directors and works to promote smart development and increasing the housing supply in Hamilton.

At the core of our mission is pushing for increasing housing supply to deliver real relief on housing affordability, while working to promote a focusing of planning and development regulations on the matters that create a great, livable, beautiful, and affordable city.

### **STREAMLINED APPROVALS:**

While we believe streamlining approvals can help improve housing affordability, we are concerned that the timelines proposed in Bill 108 are not achievable without an increase in municipal planning staff, and thus could lead to an unfortunate increase in LPAT appeals. Attaching funding to streamlined approvals for cities facing development caseload pressure would offset these concerns.

### **INCLUSIONARY ZONING:**

We believe the changes on Inclusionary Zoning are a step in the right direction, but that a supply-neutral Inclusionary Zoning regime would be the ideal program.

While Inclusionary Zoning is extremely positive from an income mixing viewpoint, the costs of units built under IZ programs goes directly onto *just* new homebuyers or renters. It is therefore our concern that these programs, without compensation for the units built under the program, simply push up the cost of market housing even further. Our recommendation is that municipalities be given the right to purchase up to 10% of units in a development at fair market value, ahead of the developments' general sales period, for use as permanent publicly owned below-market housing.

Under this system, the supply of both market and below-market housing can increase at the same time and the cost of market housing is not increased by shifting the costs of below-market housing onto one development. As well, this program could benefit from provincial and federal funding, and has the possibility of lowering the per-unit cost of delivering below-market publicly owned housing if government shifts delivery of below-market housing to this program.

### **COMMUNITY BENEFITS CHARGE:**

The Community Benefits Charge (CBC) is a necessary move to ensure fairness and transparency in the development industry. With a fee schedule, developers will know

how much they're going to need to contribute to community amenities, and councillors and local residents will know how much developers and developments are contributing to neighbourhood and city improvements.

The authority for making exemptions to the CBC can be a tool for good. For example, non-profit and below-market housing providers could and should be exempted from the charge given the need for deeply affordable housing. Other exemption opportunities could include purpose built rental developments, and "missing middle" developments.

### **LOCAL PLANNING APPEALS TRIBUNAL:**

We are in full support of the changes to the Local Planning Appeals Tribunal. As a group that works on both better urban design and housing affordability, the test of good planning is necessary, and simply testing conformity against (often outdated or under-permissive) Official Plans does not give the Tribunal enough teeth to enforce good planning principles.

Despite it being de rigueur to criticize the Ontario Municipal Board processes as anti-democratic, 'adversarial', or taking planning power away from municipalities, it was, and still is, a needed entity. When an 11 storey mid-rise (41 Stuart St, Hamilton) cannot get approved *right next* to an ailing GO Station that desperately needs density and ridership (West Harbour GO), there is a problem with the municipal attitude around development and a non-partisan board needs to step in.

### **IN SUM:**

We support a number of the changes proposed in Bill 108 and are glad that the Government is taking a focus to the root cause of the housing affordability crisis, which is that we do not have enough supply, and that the cost of new supply should be addressed.

There are a number of other measures that should be taken regarding housing, but this Bill is a positive start and we believe for the most part, should be passed.

We appreciate the opportunity to comment and will also be submitting a short comment on Schedule 3.

On behalf of the board,

Lachlan Holmes  
*Founder*