

REGIONAL PLANNING COMMISSIONERS OF ONTARIO (RPCO)

RESPONSE TO PROVINCIAL HOUSING AFFORDABILITY TASK FORCE RECOMMENDATIONS

(Note : This submission does do not supersede or replace individual municipal responses.)

#	Top 5 Recommendations	Rationale/Comments Pertinent to all Top Five Recommendations
1.	Based on recommendation #20 – Create an Approvals Facilitator or Provincial Chief Planner, who can assist on resolving conflicts to further streamline development review by municipalities and the Province.	The major levers to creating housing largely lie outside of municipal influence and control. These include interest rates, and both the supply and cost of labour and materials. Senior government levels must incentivize housing programs all the way to the consumer (e.g. owners and renters) to truly achieve any levels of housing affordability, even as supply is augmented.
2.	Based on Recommendation #26 – Streamline Ontario Land Tribunal appeal process, requiring appellants to seek permission and to demonstrate that the appeal has merit, relying on evidence and expert reports before accepting an appeal.	Municipalities have already contributed heavily to addressing the current housing situation, especially in forgoing over \$1B annually in development charges and by implementing more streamlined development review systems (with little to no added resources, and with existing municipal planning services being strained).
3.	Based on Support and Scaling Up Section of Recommendations - Introduce Provincial and Federal incentives, including funding programs, to promote the development of purpose-built rentals, and other affordable housing types.	Ontario is experiencing a housing affordability crisis. Housing must be made <u>and kept</u> affordable. Municipalities are already steeped in development expertise and know their communities best.
4.	Based on Recommendations #45-47 – Prioritize and promote skilled trades.	They can implement more effectively than senior government levels. Let them be the public sector lead.
5.	Based on Recommendation #43 – Enable municipalities to withdraw allocations from any permitted projects where construction has not been initiated within three years of approvals being issued.	Municipalities deliver quality communities through local decision-making processes that allow citizens to have a direct say in shaping their communities. Local decision-making needs to continue. A renewed focus on making material OLT improvements would help alleviate major bottlenecks to the development review process.

#	Task Force Recommendations	Agree/ Disagree	RPCO Comments
1.	Set a goal of building 1.5 million new homes in ten years.	Agree in Principle	This is a stretch goal by 2031. Increased immigration may also support this stretch goal. All stakeholders need to be cognizant that growth typically runs in cycles and must include a variety of affordable housing types. Monitoring production needs to occur, and new methods of housing construction will also be essential. The strategy should include the use of surplus Provincial and Federal lands that are suitable for orderly development (i.e. prioritizing lands within municipally planned development boundaries, and giving preference to intensification in existing built up areas). As a starting point, 20% of the units created should be affordable.
2.	Amend the Planning Act, Provincial Policy Statement, and Growth Plans to set “growth in the full spectrum of housing supply” and “intensification within existing built-up areas” of municipalities as the most important residential housing priorities in the mandate and purpose.	Agree in Principle	This goal should be accompanied by commitments to build more sustainable and (quality) communities, including environmental and financial aspects (e.g. green standards, affordability). Purpose-built rental housing should be a part of the stated goal.
3.	<p>Limit exclusionary zoning in municipalities through binding provincial action:</p> <p>a) Allow “as of right” residential housing up to four units and up to four storeys on a single residential lot.</p> <p>b) Modernize the Building Code and other policies to remove any barriers to affordable construction and to ensure meaningful implementation (e.g., allow single-staircase</p>	<p>a) Agree in Principle</p> <p>b) Agree in Principle</p>	<p>a) Increasing as-of-right intensification must be accompanied by a strong regulatory environment that actively and practically supports such issues as building and site design excellence, and thoughtful integration into existing communities. It must be supported by “people based” customer service, and not simply “paper or web- based” resource materials. In concept, the “four and four” approach with some associated standards has merit. It will also be critical to monitor water and sewage capacity for necessary upgrades.</p> <p>b) Changes to Ontario Building Code must continue to ensure Fire and Life Safety protection remain at high thresholds. New construction approaches and technologies should also be examined to remove unnecessary barriers to affordable construction, and meaningful implementation..</p>

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	construction for up to four storeys, allow single egress, etc.).		
4.	Permit “as of right” conversion of underutilized or redundant commercial properties to residential or mixed residential and commercial use.	Agree in Principle	This would also reflect current and likely future shifts in market dynamics, such as work from home and on-line purchases of goods and services. Mixed use environments create flexibility.
5.	Permit “as of right” secondary suites, garden suites, and laneway houses province-wide.	Agree	As noted above, this must be accompanied by strong support from regulators, including Fire and Building officials. Directing people to a web site isn’t enough.
6.	Permit “as of right” multi-tenant housing (renting rooms within a dwelling) province-wide.	Agree	When done to high standards of safety, a good way to realize even more gentle intensification.
7.	Encourage and incentivize municipalities to increase density in areas with excess school capacity to benefit families with children.	Agree	This would need to be appropriately implemented (e.g. relative to issues like class size). In dealing with class cycles, innovative approaches, such as using empty classrooms for community uses (like daycare and adult day programs) should be considered. Maintaining ownership of schools and school properties should also be prioritized.
8.	Allow “as of right” zoning up to unlimited height and unlimited density in the immediate proximity of individual major transit stations within two years if municipal zoning remains insufficient to meet provincial density targets.	Disagree	<p>It is important not to confuse issues of compatibility and capacity with NIMBY. Development review done well is a win-win for communities and developers.</p> <p>Peel Region has encountered servicing issues around Mississauga City Centre that has no height/density caps. It is difficult to plan for services without knowing what to plan for and there is a risk of stranded debt if over-service lands and costs are not recovered through Development Charges.</p>
9.	Allow “as of right” zoning of six to 11 storeys with no minimum parking requirements on any streets utilized by public transit (including streets on bus and streetcar routes).	Requires additional consideration	<p>Allowing for no minimum parking is supported, as it also reflects shifts away from cars to transit, car share programs, and other transportation modes.</p> <p>Allowing as-of-right heights appears to be arbitrary, and we are unclear as to the rationale for recommending such heights.</p>

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			However, one issue is the potential for changes to public transit routes. What happens if transit service is reduced or eliminated in areas of high density? Particularly in times of fiscal restraint and constraint, this is a real possibility.
10.	Designate or rezone as mixed commercial and residential use all land along transit corridors and redesignate all Residential Apartment to mixed commercial and residential zoning in Toronto.	Agree in Principle	We expect that consultation with Toronto on the many planning considerations would occur first, and before any decisions are made.
11.	Support responsible housing growth on undeveloped land, including outside existing municipal boundaries, by building necessary infrastructure to support higher density housing and complete communities and applying the recommendations of this report to all undeveloped land.	Disagree	<p>Not all land is appropriate for housing. Employment lands and parks and open space systems also need to be protected. Economic prosperity is fundamental to community prosperity. Allowing for development outside of boundaries will be counter-productive, creating islands of development potential with patchwork, and costlier infrastructure plans. In some cases, infrastructure systems may not even be viable.</p> <p>Isolated pockets of growth will create additional development costs and operating costs associated with soft services such as schools and other community facilities for all levels of government. Integrated and coordinated growth management will maximize Provincial investments in essential infrastructure.</p>
12.	<p>Create a more permissive land use, planning, and approvals system:</p> <p>a) Repeal or override municipal policies, zoning, or plans that prioritize the preservation of physical character of neighborhood</p> <p>b) Exempt from site plan approval and public consultation all projects of</p>	<p>a) Disagree</p> <p>b) Agree in Principle</p>	<p>a) Disagreement based on people choosing and wanting to live in established communities with identifiable, and cohesive building forms. Allow for appropriate infill development instead.</p> <p>b) Could be design implications.</p>

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	<p>10 units or less that conform to the Official Plan and require only minor variances</p> <p>c) Establish province-wide zoning standards, or prohibitions, for minimum lot sizes, maximum building setbacks, minimum heights, angular planes, shadow rules, front doors, building depth, landscaping, floor space index, and heritage view cones, and planes; restore pre-2006 site plan exclusions (colour, texture, and type of materials, window details, etc.) to the Planning Act and reduce or eliminate minimum parking requirements; and</p> <p>d) Remove any floorplate restrictions to allow larger, more efficient high-density towers.</p>	<p>c) Disagree</p> <p>d) Disagree</p>	<p>c) Planned communities can be highly variable, in part a function of local market conditions. A “one size fits all” approach is not seen as viable.</p> <p>d) Floorplate decisions require thorough discussion between municipalities and developers. We agree that some floor plates are now obsolete, and that floor plates supporting a variety of uses would be best.</p>
13.	Limit municipalities from requesting or hosting additional public meetings beyond those that are required under the Planning Act.	Disagree	<p>This is an essential element of local decision-making. Look for efficiencies elsewhere, such as OLT reform.</p> <p>By ensuring municipalities have up to date Official Plan and Zoning By-laws that plan for what we want to see, not what is there today, the requirement for site specific rezonings can be reduced and/or eliminated.</p>

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14.	Require that public consultations provide digital participation options.	Agree	This would be a progressive step. Input would still need to be properly documented and publicly available to ensure transparency.
15.	Require mandatory delegation of site plan approvals and minor variances to staff or pre-approved qualified third-party technical consultants through a simplified review and approval process, without the ability to withdraw Council's delegation.	Agree in Principle	More discussion regarding third party consultants is required.
16.	Prevent abuse of the heritage preservation and designation process by: a) Prohibiting the use of bulk listing on municipal heritage registers b) Prohibiting reactive heritage designations after a Planning Act development application has been filed	Agree in Principle	Potential refinements should be discussed at the local municipal level.
17.	Requiring municipalities to compensate property owners for loss of property value as a result of heritage designations, based on the principle of best economic use of land.	Disagree	Speculative development is not a right. Heritage properties have significant value from a variety of perspectives.
18.	Restore the right of developers to appeal Official Plans and Municipal Comprehensive Reviews.	Disagree	This will cause delay and likely increase costs dramatically. Furthermore, if developers should be able to appeal, why not include other landowners or residents/citizens/other interests?
19.	Legislate timelines at each stage of the provincial and	Disagree	The Province has already required major changes to development review, supported by the provision of funds through the Streamlining Development Approvals Fund. Developers can also need

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	municipal review process, including site plan, minor variance, and provincial reviews, and deem an application approved if the legislated response time is exceeded.		extra time and can be the reason for instances of protracted time periods required to process development applications.
20.	Fund the creation of “approvals facilitators” with the authority to quickly resolve conflicts among municipal and/or provincial authorities and ensure timelines are met.	Agree	The qualifications of these people and their authority would need to be better understood. A “go to” person at the Province such as a “Chief Planner” would help to resolve competing or conflicting Ministry comments.
21.	Require a pre-consultation with all relevant parties at which the municipality sets out a binding list that defines what constitutes a complete application; confirms the number of consultations established in the previous recommendations; and clarifies that if a member of a regulated profession such as a professional engineer has stamped an application, the municipality has no liability, and no additional stamp is needed.	Agree in principle	There have been many adjustments made through improvements to development application processes under Bill 23. The Province needs to ensure there is clear exemption of municipal liability through the passage of appropriate legislation or other regulatory tools. Applicants should work with municipalities in the preapplication process to ensure quality, complete applications in order to start the time clock. Terms of reference for application studies need to be clear and reasonable.
22.	Simplify planning legislation and policy documents.	Agree	This should be a joint municipal-Provincial initiative. Provincial Ministries and agencies play key roles in development review, and the time required to receive their comments can be an impedance to timely local decision-making.
23.	Create a common, province-wide definition of plan of	Agree in Principle	This could help streamline the process but needs to ensure clarity of conditions. Too high level can be meaningless.

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	subdivision and standard set of conditions which clarify which may be included; require the use of standard province-wide legal agreements and, where feasible, plans of subdivision.		
24.	Allow wood construction of up to 12 storeys.	Agree in principle	Fire and Life Safety remain paramount if this is to occur.
25.	Require municipalities to provide the option of pay on demand surety bonds and letters of credit.	Agree in principle	Applicability needs to be scoped and well-defined and exclude matters like development charge deferrals.
26.	Require appellants to promptly seek permission (“leave to appeal”) of the Tribunal and demonstrate that an appeal has merit, relying on evidence and expert reports, before it is accepted.	Agree in principle	Need to ensure that the cost of such an exercise is not out of reach of citizens. The Province could consider something akin to a “Help Desk” to assist people in understanding what is required. Tribunal needs clear rules to consistently and quickly make decisions in these cases.
27.	Prevent abuse of process: a) Remove right of appeal for projects with at least 30% affordable housing in which units are guaranteed affordable for at least 40 years. b) Require a \$10,000 filing fee for third-party appeals. c) Provide discretion to adjudicators to award full	a) Agree in Principle b) Disagree c) Disagree	a) Planning merits, especially design considerations, are critical for all projects. If this step is taken, affordable housing definitions must be consistent with Official Plan definitions. Furthermore, units should be affordable for a minimum of 50 years. Finally, density bonuses that increase the number and range of units (i.e. not simply studio units) should be considered. b) Being unable to pay for the costs of an appeal is punitive to Ontarians. c) Implement the current rules better where appeals are frivolous or vexatious.

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	costs to the successful party in any appeal brought by a third party or by a municipality where its council has overridden a recommended staff approval.		
28	Encourage greater use of oral decisions issued the day of the hearing, with written reasons to follow, and allow those decisions to become binding the day that they are issued.	Agree	In straight forward cases, this makes sense. However, more complicated situations may still require written decisions. The framework used for written decisions should be reviewed. Are they too long? Too detailed?
29.	Where it is found that a municipality has refused an application simply to avoid a deemed approval for lack of decision, allow the Tribunal to award punitive damages.	Disagree	<p>Municipalities are faced with incomplete or inadequate applications on a regular basis.</p> <p>Under existing OLT rules and procedures, there is an opportunity to seek costs.</p> <p>The denial of an application may be based on comments received from one or more Provincial Ministries or agencies (e.g. MTO regarding traffic capacity, Metrolinx not issuing development permits, MNR regarding alterations affecting a wetland) and the proposed change could have broader implications for who the costs are awarded against (i.e. more than just the local municipality).</p>
30.	Provide funding to increase staffing (adjudicators and case managers), provide market-competitive salaries, outsource more matters to mediators, and set shorter time targets.	Agree	More resources would be helpful.
31.	In clearing the existing backlog, encourage the Tribunal to prioritize projects close to the finish line that will support housing growth and	Agree	Broaden any “triage” type actions. Employment lands creation can also be critical (e.g. electric vehicle parts manufacturing and assembly). It is also important to note that municipalities cannot require development to proceed unless there are unique contractual arrangements.

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	intensification, as well as regional water or utility infrastructure decisions that will unlock significant housing capacity.		
32.	Waive development charges and parkland cash-in-lieu and charge only modest connection fees for all infill residential projects up to 10 units or for any development where no new material infrastructure will be required.	Disagree	Growth should pay for growth. Parkland is arguably needed even more, and is more valuable, as private open spaces (e.g. backyards, roof top gardens) are smaller or non-existent, and development densities are higher. Fees and charges from development are important tools that municipalities have to minimize the gap between the investment required for growth-based infrastructure and costs that are recovered through growth-based revenues. The cost of acquiring land for parks increases as growth continues, and as noted above, the need for parkland increases as cities intensify.
33.	Waive development charges on all forms of affordable housing guaranteed to be affordable for 40 years.	Agree in Principle	Need to ensure the units stay affordable for such a period, including the resale or re-renting of a home. Also need to make municipalities financially whole, as infrastructure is still required. Otherwise, we assume that the Province is supporting a model wherein rate payers will be expected to pay for growth through further increases to their property tax bills.
34.	Prohibit interest rates on development charges higher than a municipality's borrowing rate.	Disagree	This has the potential to make matters much worse. Municipalities do not have access to "out of market" interest rates.
35.	Regarding cash in lieu of parkland, s.37, Community Benefit Charges, and development charges: a) Provincial review of reserve levels, collections and drawdowns annually to ensure funds are being used in a timely fashion and for the intended purpose, and, where review points to a significant concern, do	a) Agree in Principle	a) Monitoring use and absorption are good "accounting" principles. However, the more relevant consideration is that funds are allocated to projects, as municipalities may support new investments in infrastructure through a range of revenue tools which may take many budget cycles to assemble.

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	<p>not allow further collection until the situation has been corrected.</p> <p>b) Except where allocated towards municipality-wide infrastructure projects, require municipalities to spend funds in the neighbourhoods where they were collected. However, where there's a significant community need in a priority area of the City, allow for specific ward-to-ward allocation of unspent and unallocated reserves.</p>	b) Disagree	b) Municipalities would need latitude to determine what "the same neighbourhood" means. In addition, there is already sufficient Provincial legislation and regulation regarding the allocation and expenditure of development charges and other fees associated with development. These are set out in formal municipal documents including Development Charge Background Studies and Municipal Code By-laws.
36.	Recommend that the federal government and provincial governments update HST rebate to reflect current home prices and begin indexing the thresholds to housing prices, and that the federal government match the provincial 75% rebate and remove any claw back.	Agree	Municipalities need senior government partnerships like this to actually achieve shared goals.
37.	Align property taxes for purpose-built rental with those of condos and low-rise homes.	Agree	Detailed analysis is required, including impacts on other residential rate payers, the continued role of property assessment (via MPAC), and defining "purpose built rental".
38.	Amend the Planning Act and Perpetuities Act to extend the maximum period for land	Agree	This could be an important tool in developing new affordable housing in large volume.

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	leases and restrictive covenants on land to 40 or more years.		
39.	Eliminate or reduce tax disincentives to housing growth.	Agree in principle	Should be scoped to apply to affordable housing types, including purpose-built rental housing.
40.	Call on the Federal Government to implement an Urban, Rural and Northern Indigenous Housing Strategy.	Agree	Implementation needs to be practical and efficient. No one can afford to wait months or years for funding programs to be developed and implemented. Look at potential alignment with CMHC funding streams for Indigenous communities as well.
41.	Funding for pilot projects that create innovative pathways to homeownership, for Black, Indigenous, and marginalized people and first-generation homeowners.	Agree	This would be a complement to many municipal initiatives that already support the same goal. However, added municipal resources would be needed (and funded) from senior government levels.
42.	Provide provincial and federal loan guarantees for purpose-built rental, affordable rental and affordable ownership projects.	Agree	This would be a very valuable initiative as long as the guarantees are “bankable”. Make non-profit and public which deliver 99 years of affordability a priority.
43.	Enable municipalities, subject to adverse external economic events, to withdraw infrastructure allocations from any permitted projects where construction has not been initiated within three years of build permits being issued.	Agree in principle	Broaden to include all Planning Act approvals and clarify what is meant by “adverse external economic events”.
44.	Work with municipalities to develop and implement a municipal services corporation utility model for water and wastewater under which the municipal corporation would	Disagree	Growth should pay for growth. This appears to simply be a “quieter” shift to again place the costs of growth onto existing municipal rate payers.

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	borrow and amortize costs among customers instead of using development charges.		
45.	Improve funding for colleges, trade schools, and apprenticeships; encourage and incentivize municipalities, unions and employers to provide more on-the-job training.	Agree	RPCO continues to support initiatives that enhance our Province's skilled trades pool.
46.	Undertake multi-stakeholder education program to promote skilled trades.	Agree	Please see above. RPCO would be pleased to be a part of such an initiative.
47.	Recommend that the federal and provincial government prioritize skilled trades and adjust the immigration points system to strongly favour needed trades and expedite immigration status for these workers, and encourage the federal government to increase from 9,000 to 20,000 the number of immigrants admitted through Ontario's program.	Agree	A matter for discussion between senior government levels, but we support in principle.
48.	The Ontario government should establish a large "Ontario Housing Delivery Fund" and encourage the federal government to match funding. This fund should reward:		

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	a) Annual housing growth that meets or exceeds provincial targets	a) Disagree	a) Any performance-related program needs to have “the right measures”. How much affordable housing was built? What impediments are outside of government control or influence? It would be more desirable to have a fund that focuses on elements like “core need” households, green development, and innovative models (e.g. development on public land using long term land leases). Rewarding municipalities that update their zoning by-laws is a good idea.
	b) Reductions in total approval times for new housing	b) Disagree	b) SDAF already compels municipalities to be efficient. External factors, such as developer-driven actions and comments from senior government can slow these processes.
	c) The speedy removal of exclusionary zoning practices	c) Agree in Principle	c) Exclusionary zoning requires a thorough discussion with all stakeholders before further decisions are made. There appear to be great confusion and differing views regarding implementation in particular.
49.	Reductions in funding to municipalities that fail to meet provincial housing growth and approval timeline targets.	Disagree	So many factors lie outside of municipal influence or control, including interest rates, market demand, and labour and material availability and cost.
50.	Fund the adoption of consistent municipal e-permitting systems and encourage the federal government to match funding. Fund the development of common data architecture standards across municipalities and provincial agencies and	Agree in Principle	This would be a progressive step.

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	require municipalities to provide their zoning bylaws with open data standards. Set an implementation goal of 2025 and make funding conditional on established targets.		
51.	Require municipalities and the provincial government to use the Ministry of Finance population projections as the basis for housing need analysis and related land use requirements.	Disagree	We would suggest MOF projections only be used where other data does not exist, including Statistics Canada and CMHC data and analytics.
52.	Resume reporting on housing data and require consistent municipal reporting, enforcing compliance as a requirement for accessing programs under the Ontario Housing Delivery Fund.	Agree	This is a good step that needs to be preceded by a discussion of what data should be collected.
53.	Report each year at the municipal and provincial level on any gap between demand and supply by housing type and location and make underlying data freely available to the public.	Disagree	This has the potential to be a large resource user, especially where staff must be redirected to monitor rather than support development review.
54.	Empower the Deputy Minister of Municipal Affairs and Housing to lead an all-of-government committee, including key provincial ministries and agencies, that	Agree	This would be a good step. The role and powers of the Deputy Minister would need to be clearly established. We understand this initiative is in process but has not been fully activated.

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	meets weekly to ensure our remaining recommendations and any other productive ideas are implemented.		
55.	Commit to evaluate these recommendations for the next three years with public reporting on progress.	Agree	This would be a good step and must be accompanied by accurate documentation around why progress was or was not made.
App B (A)	Call upon the federal government to provide equitable affordable housing funding to Ontario.	Agree	We are unclear as to what “equitable” means. The Federal and Provincial governments need to be active partners to incentivize affordable and purpose-built rental housing.
App B (B)	Develop and legislate a clear, province-wide definition of “affordable housing” to create certainty and predictability	Agree	We are currently examining the Province’s proposal under an ERO. However, we still await a proposed definition for “attainable housing”.
App B (C)	Create an Affordable Housing Trust from a portion of Land Transfer Tax Revenue (i.e., the windfall resulting from property price appreciation) to be used in partnership with developers, non-profits, and municipalities in the creation of more affordable housing units. This Trust should create incentives for projects serving and brought forward by Black- and Indigenous-led developers and marginalized groups.	Agree	We support this initiative and would request that municipalities be a part of the actual creation of the Trust, as they are the front line of public sector development implementation. Could funds from the Non-Resident Speculation Tax be included?
App B (D)	Amend legislation to: <ul style="list-style-type: none"> Allow cash-in-lieu payments for Inclusive Zoning units at the 	Agree	Added municipal latitude is appreciated.

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	<p>discretion of the municipality.</p> <ul style="list-style-type: none"> Require that municipalities utilize density bonusing or other incentives in all Inclusionary Zoning and Affordable Housing policies that apply to market housing. Permit municipalities that have not passed Inclusionary Zoning policies to offer incentives and bonuses for affordable housing units. 		
App B (E)	<p>Encourage government to closely monitor the effectiveness of Inclusionary Zoning policy in creating new affordable housing and to explore alternative funding methods that are predictable, consistent and transparent as a more viable alternative option to Inclusionary Zoning policies in the provision of affordable housing.</p>	Agree in Principle	Again, municipalities should be a part of designing such a monitoring process.
App B (F)	<p>Rebate MPAC market rate property tax assessment on below-market affordable homes.</p>	Agree in Principle	We would need to understand the mechanics and potential collateral impacts of such a rebate.