

From: [More Neighbours Volunteer](#)
To: [Planning and Housing](#)
Cc: [Councillor Bailao](#); [Councillor Bradford](#); [Councillor Fletcher](#); [Councillor Nunziata](#); [Councillor Perks](#); [Councillor Wongtam](#)
Subject: PH28.1 - Real Inclusionary Zoning Means Ending Exclusionary Zoning
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To the City Clerk:

Please add our comments from More Neighbours Toronto to the agenda for the October 28, 2021 Planning and Housing Committee meeting on item 2021.PH28.1, Inclusionary Zoning Official Plan Amendment, Zoning By-law Amendment and Draft Implementation Guidelines

I understand that our comments and information in this email will form part of the public record and that our organization will be listed as a correspondent on agendas and minutes of City Council or its committees. Also, we understand that agendas and minutes are posted online and our organization may be indexed by search engines like Google.

Comments:

Dear Members of the Planning and Housing Committee,

We are writing to you to request that the committee consider ending exclusionary zoning alongside the implementation of new Inclusionary Zoning requirements. At the very least, we request that the committee include density bonuses, relaxed urban design guidelines, and financial benefits (ie OpenTO program) as part of the Inclusionary Zoning implementation to offset the impacts of higher targets. We'd like to remind the committee that Toronto's housing crisis impacts affordable and market-rate housing, and that good outcomes are intrinsically linked.

Inclusionary Zoning (IZ) has the potential to be an effective tool for ensuring that new affordable housing is present in every neighbourhood, with the outcome encouraging mixed income neighbourhoods if implemented correctly. However, for IZ to work as intended, it must be paired with legalizing multi-unit housing in every neighbourhood and the end of exclusionary zoning policies in Toronto. Without ending exclusionary zoning (aka, single-detached R1), entire neighbourhoods will remain off-limits and unaffordable to everyone but the wealthy and privileged. This exclusionary zoning is not addressed whatsoever by new rules for Inclusionary Zoning, and we believe that to be ethically egregious. Furthermore, we believe it is impossible to build the amount of affordable and market rate units Toronto needs to house current and future residents of the city without legalizing multiplex housing in every neighbourhood. Growth belongs in more places than avenues, transit-oriented development areas, former industrial sites, or next to polluted transportation corridors.

We also urge committee to follow the recommendation of the consultant's report to provide density bonuses, relaxed urban design guidelines, and financial incentives in return for higher proportions or absolute number of units of affordable housing. IZ without density bonuses, financial incentives, or

relaxed design guidelines runs the risk of discouraging new housing developments from being built at all. In the long term, this will result in higher prices for market-units, which would therefore also reduce the relative affordability of “affordable” units (As many designated affordable units many are tied to market prices, not just income). Furthermore, if less development is feasible, it will result in less market-rate and less affordable housing units, even when higher affordable targets are considered. This is a bad outcome and will increase the pain the housing crisis is already having on Toronto’s working poor, middle class, new residents, and youth.

Density bonuses and relaxed guidelines are a win-win: more affordable housing and more market-rate housing gets built faster providing relief to residents who don’t qualify or are on wait lists for affordable housing. Density bonuses allow costs to be distributed across more properties and will facilitate more projects becoming feasible. We must learn from and replicate the recent example of 150 Queens Wharf Road (PH27.1), where increasing the height of the building allowed for the delivery of 25% more affordable housing. Lastly, In the absence of government funding for affordable housing, increased costs will be passed on to those in new market-rate units. This places an unfair burden on new residents via higher prices while existing owning residents are not asked to contribute despite being the largest financial beneficiaries from accelerating price growth in the city. Therefore, the city needs to consider extending financial benefits to builders already available in programs like OpenTO to ensure all residents, not just new residents, contribute fairly to affordable housing costs.

Inclusionary Zoning is a policy our city desperately needs. Approached thoughtfully, it has the potential to meaningfully alleviate the accelerating housing crisis and ensure mixed-income neighbourhoods survive the crisis. Without thoughtful consideration of the economics, the approach taken by the city could exacerbate the housing crisis and result in less attainable housing for everyone.

Regards,

More Neighbours Toronto

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