

November 8, 2021

Toronto City Council
100 Queen Street West
Toronto, ON M5H 2N2
Sent via email: clerk@toronto.ca

Dear Mayor Tory and Members of Council,

Re: Statement of support for agenda item PH28.1 Inclusionary Zoning Official Plan Amendment, Zoning By-Law Amendment and Draft Implementation Guidelines

On behalf of the Co-operative Housing Federation of Canada (CHF Canada) and the Co-operative Housing Federation of Toronto (CHFT), we are writing to Council to urge you to move forward with the proposed inclusionary zoning bylaw.

CHF Canada is the national voice of the co-operative housing movement in Canada. We represent over 1,000 co-operative communities that are found in every province and territory of the country. CHFT is the regional co-operative housing federation representing housing co-ops in Toronto, Durham and York Region.

For over 50 years CHFT and CHF Canada have supported the growth and development of mixed-income housing co-operatives in the City of Toronto. There are currently 180 mixed-income, co-operative communities providing good quality homes to over 16,000 households.

For the past decade, we have been very concerned to see low-income renters in the City of Toronto fall further and further behind. Since 2016, when the City of Toronto first proposed pursuing inclusionary zoning the situation has only deteriorated. The development of new homes and condominiums, while increasing the housing stock overall, has not made housing more affordable for many in the City. The proposed inclusionary zoning by-law would have a direct and positive impact on the supply of affordable housing within the City of Toronto. While we share some of the concerns of others that the City may not be maximizing the potential positive effect of inclusionary zoning by not seeking set aside rates as high as may be feasible, given the urgent nature of the affordable housing crisis it is most important that the by-law moves forward.

We would suggest, however, that the City consider giving established non-profits, co-operatives, and land trusts enhanced ability to negotiate directly with the developer over the details of the

affordable housing units within a building. In particular, we feel there should be the opportunity to have a voice and impact in decisions around where the affordable housing rental units fit within the larger building site in order to provide a sense of shared community, which is central to some types of non-profits, as well as co-op housing providers.

For co-ops, the ability to create a sense of community within the co-op and within the larger development is a key benefit of this type of housing. As such, we would not find value in restrictive policies and rules that dictate how the units must be laid out, as this has the potential to undermine the co-op community. This type of rule, if imposed, could prove burdensome to the realization of other affordable housing needs and purposes within a building and community at large.

CHF Canada also sees benefit in offsite housing in cases strategically approved by the City. The option of affordable units built in a separate structure close to a new development, instead of within the main building structure, could provide a way for greater units of affordable housing to be built. This could be particularly beneficial within high-end developments where the operating costs of the building and subsequent fees may prove restrictive to the number of affordable units built by the developer. We support the possibility of off-site options in cases where this would allow for the building of a greater number of affordable units.

Overall, we are pleased to see this by-law in its final stages of planning with the City of Toronto. Inclusionary zoning will have a real impact on affordable housing opportunities within the City and we hope this will serve as a template of success for other regions within the province.

Thank you for your consideration of our recommendations.

Sincerely yours,



Tom Clement
Executive Director
Co-operative Housing Federation of Toronto



Tim Ross
Executive Director
CHF Canada