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Planning & Housing Committee
10th floor, West Tower, City Hall
100 Queen Street West
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Re: 28.1 – Inclusionary Zoning Official Plan Amendment, Zoning By-Law Amendment and Draft Implementation Guidelines

Dear Chair & Committee Members,

I am writing to request you support adding Little Jamaica to the City's Inclusionary Zoning submission to the Government of Ontario.

Forces including a decade of LRT construction, gentrification, and the pandemic has threatened Black businesses and homes. Any development that moves forward in this community must include all of the community. IZ is one tool that will help in this fight. That's why I moved a motion (<http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2020.MM24.36>), supported by Council in September 2020, directing Staff to designate Little Jamaica for Inclusionary Zoning.

The exclusion of the Eglinton West area from the IZ policy not only denies the community an opportunity to stay in their neighbourhood, but does not stand up to scrutiny. It is important to note that the NBLC report, which underpinned the recommendations before Committee, did not specifically assess Little Jamaica. Instead they looked at the old city of York as a region and performed a test case in Weston.

Indeed, the high-level market analysis doesn't match the facts on the ground. As the Toronto Star recently reported, there are 41 active planning applications in the Little Jamaica area. It doesn't make sense that areas of the City such as Keele and Finch and the Golden Mile in Scarborough, which are similarly expecting new LRTs in the next few years, would meet the market criteria, while Little Jamaica would not.

Given that the area is already attracting significant development pressure, the community is concerned that waiting several years to include Little Jamaica will spur a rush of applications from developers looking to avoid providing affordable housing. Delaying the implementation of IZ could lead to a significant portion of the community being displaced.

Second, and more importantly, I don't accept that the decision as to whether Little Jamaica, or any area of Toronto, is designated for Inclusionary Zoning be solely based on land economics with a profit assumption based on the needs of developers and their financiers. The City and the Province both have an obligation to apply different lenses through which to view affordable housing.

This issue is similar to the labour debate currently taking place. If you can't operate a business without paying your workers a living wage maybe you don't have a business worth operating. Likewise, if you're a developer that complains you can't make a condo work if it provides affordable homes for communities, maybe your condo isn't worth building.

Thank you for your consideration of the recommendation below.

Recommendations:

1. City Council request that the Chief Planner & Executive Director, City Planning undertake additional market analysis in the area surrounding Little Jamaica within 500-800 metres of the Eglinton Crosstown stations to determine if this area should be added to the Inclusionary Zoning Map of the Official Plan policy for submission to the Government of Ontario in 2022 and report to the June meeting of Planning & Housing Committee.
2. City Council request the Chief Planner & Executive Director, City Planning, to develop a new framework to assess which areas are suitable for Inclusionary Zoning, and the percentage of units therein, based on a human rights approach to housing that considers;
 - a. Local need for affordable housing;
 - b. Community displacement; and
 - c. Different models of housing provision.