



BUILDING A GREATER GTA
Building Industry and Land
Development Association

EX16.26.1

June 24, 2016

Mayor John Tory and members of the Toronto Executive Committee
10th floor, West Tower
City Hall
100 Queen Street West
Toronto, ON
M5H 2N2

**RE: June 28th Executive Committee Meeting
Agenda Item EX16.26 Implementing the Open Door Affordable Housing Program**

On behalf of the members of the BILD Toronto Chapter, we appreciate the opportunity to submit comments on the City's staff report regarding "Implementing the Open Door Affordable Housing Program," which will be heard at the June 28th Toronto Executive Committee meeting. We recognize that the intent of this report is to accelerate the creation of affordable housing units, through the City's *Open Door* program, and thereby increasing the opportunities for lower-income and vulnerable individuals and families to access safe, healthy and adequate homes.

Our industry believes that achieving the City's annual goal of 1,000 new affordable rental homes and 400 new affordable ownership homes can be recognized through a 'partnership approach' which is exemplified in the city's staff report. We applaud the affordable housing office, city planning and city finance for their diligent efforts in this regard.

We recognize that several tools have been proposed to support this cause; such as a Gold Star approval process, financial incentives (at the discretion of council) and unlocking city-owned surplus lands. We believe these tools will help to achieve the City's goals because they assist developers in delivering this product type, as well as provide subsidies to new affordable housing owners. We also believe that in the absence of these incentives, the City's noted cumulative shortfall of 3,152 affordable rental and 423 affordable ownership homes will perpetuate.

We understand that a tandem process to *Open Door* is underway with the City of Toronto's review of its Official Plan definition of *affordable housing*. A key variable to the future health of our *affordable housing* stock is its definition and its categorical breakdown by price thresholds. As the definition is a determining factor to the eligibility of accessing these tools to deliver this product type.

As a critical component to the success of the future *Open Door* program, we encourage the City to consider a definition that is reflective of its market realities and close the gap between the disparities with the provincial definition. Utilizing an appropriate (and higher price thresholds) definition of *affordable housing* will increase the eligibility of the *Open Door* program and offer more support in achieving the goals and objectives of Council. Alternatively, we request the continuance of the *assist ownership* definition, for the use of the *Open Door* program. We would be happy to meet with city staff to discuss this aspect of our comments in greater detail.

As referenced in the staff report, inclusionary zoning is a planning mechanism that is currently under review at the province level of government. We acknowledge that the incentives in the city's staff report would be beneficial for the City to include in any potential inclusionary zoning policies.

While private development is a complex process that is highly exposed to market land costs and variability, as well as inherent risk, supporting the expansion of these tools to all developments that achieve affordable housing units will strengthen the ability to meet the goals of the *Open Door* program.

Finally, we recognize that “guidelines” are to be prepared to assist in the proposed process of delivering affordable housing and we would be happy to meet in consultation with city staff, when appropriate.

Again, we appreciate the opportunity to submit these comments and thank the Mayor and members of the Toronto Executive committee for their time and consideration of these thoughts. Please feel free to contact the undersigned if you have any comments.

Sincerely,



Danielle Chin MCIP RPP
Senior Manager, Policy & Government Relations

CC: Gary Switzer, *BILD Toronto Chapter Chair*
BILD Toronto Chapter members
Sean Gadon, *Director, Affordable Housing Office*
Jennifer Keesmaat, *Chief Planner and Executive Director, City Planning*
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