

Inclusionary Zoning Public Consultation Comments and Update

Date: October 23, 2019

To: Planning and Housing Committee

From: Chief Planner and Executive Director, City Planning

Wards: All

SUMMARY

This report presents the results of public consultations conducted over the past six months on the proposed Inclusionary Zoning policy directions considered by Planning and Housing Committee at its May 2019 meeting.

Inclusionary Zoning (IZ) is a land-use planning tool that enables the City to require that affordable housing units be included in new residential developments. Through Inclusionary Zoning, the City has the potential to increase the supply of affordable housing, continue to encourage market housing development by supporting a diverse range of housing supply, and create more inclusive, complete and equitable communities.

Staff developed proposed policy directions for Inclusionary Zoning based on initial consultations with key stakeholders as well as findings from an in-depth analysis of housing need and demand over the past 10 years, current trends in market pricing for ownership and rental housing, and potential impacts of Inclusionary Zoning on the financial viability of market developments.

The public consultation approach on the proposed policy directions included engagement on broad options for the application of Inclusionary Zoning and facilitation of independent community groups to host their own consultation events, as directed by the Planning and Housing Committee. The consultations also asked for feedback on a proposed new definition of affordable ownership housing. Staff were previously directed by the Planning and Growth Management Committee on April 6, 2016 to report back on a new Official Plan definition of affordable ownership housing in conjunction with Inclusionary Zoning.

Overall, there was general support for Inclusionary Zoning, with many stakeholders and members of the public recommending that the official plan policies provide a clear framework for implementation and maximize opportunities for creating new units in

market developments that remain affordable over the long term. Many suggested the City move to an income-based definition of "affordable" to better reflect rent levels that are affordable to low-income households. The feedback from this first round of public consultation will help to inform further analysis on the Assessment Report and the development of a draft policy framework.

Since the background financial impact analysis work and proposed policy directions for Inclusionary Zoning were presented to the Planning and Housing Committee on May 28, 2019, the Province made changes to the *Planning Act* through Bill 108 to limit where municipalities can implement Inclusionary Zoning. Previously under Bill 7 (the Promoting Affordable Housing Act, 2016), municipalities were able to determine the areas where inclusionary zoning would apply. As a result of the Province's enactment of Bill 108, Inclusionary Zoning is now limited to Protected Major Transit Station Areas or areas where a Development Permit System has been ordered by the Minister. This change came into force and effect on September 3, 2019. Bill 108 also introduced changes to remove the existing Section 37 provisions in the *Planning Act* and replace it with a capped community benefit charge that combines development charges for growth-related parks and capital infrastructure, parkland and community benefits. Details of the new community benefits authority under the *Planning Act* have not yet been outlined in a provincial regulation. The new community benefits authority may impact the Inclusionary Zoning financial impact analysis findings. For example higher or lower inclusionary zoning requirements than what was outlined in the proposed policy directions may be feasible as a result of the new community benefits framework. As a result, work on the Inclusionary Zoning policy framework cannot be finalized until the provincial regulation on the new community benefits authority is issued and any required further analysis is completed to reflect the new community benefits authority in the Inclusionary Zoning Assessment Report. A further regulation related to the CBC is anticipated to be released in the fall.

Once the regulation is issued, staff will advance work on Inclusionary Zoning, including developing a draft policy framework based on work completed to date and feedback received through the public consultations. Staff will continue to request that the Province allow the City to implement Inclusionary Zoning in areas beyond Protected Major Transit Station Areas.

RECOMMENDATIONS

The Chief Planner and Executive Director, City Planning recommends that:

1. The Planning and Housing Committee direct that the public consultation comments in Attachment 1 to this report be used to inform the development of draft Inclusionary Zoning Official Plan policies.
2. The Planning and Housing Committee direct that City Planning staff report back at the earliest possible date with draft Inclusionary Zoning Official Plan policies once provincial regulations on the new community benefits authority have been issued and any required further analysis completed.

FINANCIAL IMPACT

This report has no financial impact beyond what has already been approved in the current year's budget.

Equity Impact Statement

Access to safe, secure, affordable housing is a barrier to improved quality of life for lower-income Toronto residents and is experienced differently by different demographic groups. As part of the consultation program for Inclusionary Zoning, staff have engaged with the City's Lived Experience Advisory Group in addition to other equity seeking groups.

DECISION HISTORY

At the April 6, 2016 meeting of Planning and Growth Management Committee, the committee deferred consideration of a new Official Plan definition of affordable ownership housing in order to report back on this matter in conjunction with Inclusionary Zoning. <http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2016.PG11.1>

City Council at its meeting of January 31 and February 1, 2018 provided a response to the Province on a proposed version of the Inclusionary Zoning regulation. Many of City Council's recommendations for increased municipal decision making were incorporated into the final regulation. The report also reiterated the City's key principles for a successful Inclusionary Zoning framework: predictability; clarity and consistency; flexibility; equitable and needs based, and partnership based. <http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2018.PG25.8>

At its meeting of May 28, 2019, the Planning and Housing Committee endorsed proposed Official Plan policy directions as the basis for public consultation and directed staff to report back on the findings from the consultation in the fourth quarter of 2019. The proposed policy directions were informed by initial consultations with key stakeholders and the findings from a draft Assessment Report, comprised of a [Housing Need and Demand Analysis](#) and a [Financial Impact Analysis](#). The proposed policy directions were developed prior to May 2, 2019, when Bill 108 introduced changes to the *Planning Act* to limit municipal implementation of Inclusionary Zoning to Protected Major Transit Station Areas or areas where a Development Permit System has been ordered by the Minister. Motions were adopted directing that the public consultations on Inclusionary Zoning include broad options for the application of Inclusionary Zoning, proposed new definitions of affordable rental and ownership housing, and opportunities for independent community groups to host their own consultation events. <http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2019.PH6.2>

COMMENTS

Provincial Policy Framework

The *Planning Act* (Section 2) identifies the adequate provision of a full range of housing, including affordable housing, as a provincial interest. The Act also directs that municipal Official Plans contain such policies and measures as are practical to ensure the adequate provision of affordable housing.

On April 11, 2018, amendments to the *Planning Act* and Ontario Regulation 232/18 were enacted to enable municipalities to implement Inclusionary Zoning. Subsection 16(9) of the *Planning Act* requires that municipalities prepare an assessment report prior to adopting Inclusionary Zoning policies and the Regulation requires that the assessment report be considered as part of the development of Official Plan policies. The regulation also requires that Official Plan policies set out an approach to authorizing Inclusionary Zoning, including addressing key policy matters. Only the Minister of Municipal Affairs and Housing may appeal Inclusionary Zoning policies to the Ontario Municipal Board. <https://www.ontario.ca/laws/regulation/180232>

Bill 108 (the More Homes, More Choice Act, 2019) made changes to the *Planning Act* including a new provision limiting the City's use of Inclusionary Zoning to Protected Major Transit Station Areas or areas where a Development Permit System has been ordered by the Minister. Changes were also made to the *Planning Act* and Ontario Regulation 232/18 to remove direction on how Inclusionary Zoning could be used with Section 37 of the *Planning Act*. These changes came into force and effect on September 3, 2019.

The Provincial Policy Statement, 2014 (PPS) provides policy direction on matters of provincial interest related to land use planning and development. The PPS directs that planning authorities shall provide an appropriate range and mix of housing types to meet projected requirements of current and future residents, including establishing and implementing minimum targets for the provision of housing which is affordable to low and moderate income households. On July 22, 2019, the Ministry of Municipal Affairs and Housing posted proposed revisions to the Provincial Policy Statement (PPS 2019) on the Environmental Registry of Ontario (ERO), which include changes to encourage the development of an increased mix and supply of housing.

A Place to Grow: Growth Plan for the Greater Golden Horseshoe, 2019 came into effect on May 16, 2019. The Growth Plan (2019) contains policies to support the development of affordable housing and a diverse range of housing options to accommodate the needs of all household sizes and incomes, at all stages of life. Policy 2.2.4.9.a) of the Growth Plan directs that development within all major transit station areas will be supported, where appropriate, by planning for a diverse mix of uses, including second units and affordable housing, to support existing and planned transit service levels.

Municipal Planning and Policy Framework

The Official Plan, Section 3.2.1 Housing, contains policies supporting the provision of a full range of housing, including affordable rental and ownership housing, to meet the current and future needs of residents. Policy 3.2.1.9 of the Official Plan requires that the first priority community benefit on large sites (generally sites greater than 5 hectares in size) be the provision of affordable housing in an amount equal to 20% of the additional residential units.

The Central Waterfront Secondary Plan includes policies for the provision of new affordable housing. As part of site-specific settlements within the Secondary Plan area, the provision of affordable housing through land dedication, affordable rental units constructed as part of the development, or cash-in-lieu for a portion of the obligation has been secured. Similar to the large sites policy, affordable housing was considered the first priority community benefit.

The City has also used Section 37 of the *Planning Act* when approving new development on privately-owned lands to secure new affordable housing and capital improvements to existing social housing units.

Recent policy and zoning initiatives related to housing include increased permissions for second units through updated Official Plan policies and zoning by-law changes, as-of-right zoning and design guidelines for laneway suites, updated zoning for municipal shelters, Official Plan policies to address the loss of existing dwelling rooms, and the Growing Up design guidelines to support housing for families. In addition to the City's planning and policy framework, the City has developed a variety of municipal housing programs such as the Open Door Affordable Housing Program and Housing Now to achieve thousands of new affordable housing units. These programs provide an opportunity to layer together policy initiatives with program funding to achieve affordable housing.

Consultation Approach

A comprehensive public engagement and stakeholder consultation process was undertaken to obtain feedback on the proposed Inclusionary Zoning policy directions and draft assessment report analyses. The City retained Dillon Consulting to assist with the consultation process.

Consultation activities were completed between March and September 2019. The objective of the consultations were to educate the public on Inclusionary Zoning, share initial findings from the draft Assessment Report and obtain feedback on the proposed policy directions.

To enhance public awareness of Inclusionary Zoning and promote engagement activities, the consultation approach included:

- Posters at 100 transit shelter stops located across the City of Toronto,
- Development of an Inclusionary Zoning City website,
- Posts and event pages on the @CityPlanTO social media accounts; and

- Development of an Inclusionary Zoning video that highlights real housing stories shared by Toronto residents.

To obtain a wide range of feedback and perspectives, the consultation approach provided opportunities for multiple stakeholder groups and the general public to provide input through a variety of formats. This included:

- Pre-engagement interviews with key stakeholders to help develop the consultation approach;
- 15 stakeholder meetings with over 265 participants, including representatives from the development industry, housing advocacy groups, citizen groups, the Lived Experience Advisory Panel and the Design Review Panel;
- The creation of an Expert Advisory Panel on Inclusionary Zoning with representatives from key stakeholder groups;
- 4 public consultation meetings, 1 in each of the Community Council districts, attended by approximately 80 people;
- An online survey to engage the general public which generated responses from over 475 respondents;
- Written submissions from housing advocacy organizations;
- 2 Train-the-Trainer sessions held by City Planning to support community groups and individuals to host their own workshops on Inclusionary Zoning; and
- 12 Do-It-Yourself (DIY) Workshops with approximately 130 participants.

A public speakers' event is scheduled for the evening of November 6th to advance the conversation on Inclusionary Zoning and learn from the experiences of recognized leaders. Representatives from New York City and Boston will present on Inclusionary Zoning as it relates to their cities and participate in a moderated discussion.

Full details of the consultation approach can be found in Attachment 1: Consultation and Communication Summary Report.

Feedback from the Consultations

Throughout the consultations, the City received a variety of comments and suggestions on the proposed policy directions and Assessment Report analysis. Generally, stakeholders and the public were supportive of Inclusionary Zoning policies and felt that it should be implemented as soon as possible. It was noted by many stakeholders and residents that the City's Inclusionary Zoning policies should maximize opportunities for creating new units in market developments that remain affordable over the long term.

The following is a summary of the key feedback on the proposed policy directions received through the consultations.

Geographic Application

Proposed Policy Direction: Inclusionary Zoning would apply to strong and moderate market areas.

Feedback: Many stakeholders and members of the public were of the opinion that Inclusionary Zoning should be implemented city-wide and were concerned with the Bill 108 changes limiting Inclusionary Zoning to Protected Major Transit Station Areas or areas where a Development Permit System is ordered by the Minister. Some suggested that Inclusionary Zoning should apply based on both market viability as well as neighbourhood housing needs. Many responses from the online survey suggested that Inclusionary Zoning should apply to areas with good access to transit, services, schools and parks. Both stakeholders and the general public supported reviewing market areas every few years to capture emerging areas that become more viable for Inclusionary Zoning over time.

Scale of Development

Proposed Policy Direction: Inclusionary Zoning would apply to development projects with over 100 units in the Downtown and east and west of the Downtown and to development projects over 140 units in other Inclusionary Zoning areas.

Feedback: Most development industry stakeholders supported exempting mid-rise developments from Inclusionary Zoning, given project viability for these developments may be challenged. Some stakeholders suggested applying a lower development size threshold (e.g. using the provincial minimum threshold of 10 units or more), in order to apply Inclusionary Zoning to as many developments as possible and recognizing that lower thresholds for Inclusionary Zoning have been used by other jurisdictions. The median response from the online survey suggested a minimum development size of 50 units.

Number of Units

Proposed Policy Direction: The number of units or gross floor area required to be affordable in a development would vary between strong and moderate market areas. Two options were proposed for applying the requirement to either a percentage of the increase in density above as-of-right permissions (20% in strong market areas and 10% in moderate market areas for condominium ownership projects) or a percentage of an entire project that achieves the same intent (amount to be determined). Lower requirements would apply to purpose-built rental projects that will not be condominium-registered for a period of at least 40 years (5% of the additional residential gross floor area in strong market areas and 2.5% in moderate market areas or a percentage of an entire project that achieves the same intent). The affordable housing units would generally reflect the unit types and sizes of the market component of the development.

Feedback: Both stakeholders and the public suggested that Inclusionary Zoning requirements should apply to a percentage of an entire development, as this would provide greater certainty than requiring a percentage of the density uplift. Many stakeholders and members of the public suggested higher requirements than the proposed policy directions. Some suggested a sliding scale, where greater requirements for affordable housing apply to larger developments.

Many agreed that lower requirements should apply to purpose-built rental projects, as Inclusionary Zoning could further deter rental units from being built. However, some suggested applying Inclusionary Zoning to purpose-built rental developments proposing "luxury" rental units with high-end rents.

Many public meetings participants and survey respondents wanted the Inclusionary Zoning policies to ensure that family-sized affordable units (e.g. 2 and 3 bedroom units) would be built.

Affordability Period

Proposed Policy Direction: Units would remain affordable for 25 years. Legal agreements would secure that tenants who commence occupancy during the affordability period would not be subject to rent increases beyond the provincial rent increase guideline for the entire length of their tenancy.

Feedback: Many stakeholders and members of the public suggested a 99 year or permanent affordability period, given there will be continued need for affordable housing over time. Most identified that 25 years was not long enough to ensure a sustainable stock of affordable units. Some suggested that the affordability period match the typical lifespan of rental units. Many members of the public agreed with the proposed policy directions outlining protections for existing tenants from rent increases when the affordability period expires. Some suggested administration guidelines that set a process for limiting how long a household could live in an Inclusionary Zoning unit (e.g. 5-10 years), to ensure the Inclusionary Zoning units benefit as many people as possible and encourage movement across the housing spectrum towards market rental units or homeownership.

Depth of Affordability

Proposed Policy Direction: Low and moderate income households would be assisted by the policy framework, generally the 30th to 60th percentiles of income. At least 10% of the units would be provided at 80% of average market rents, with the remaining units to be rented at no more than 100% of average market rent.

Feedback: Stakeholders and the public agreed that Inclusionary Zoning should address the affordability needs of low to moderate income households, recognizing there is a need for deeper affordability in the city that must be addressed through other programs. Many suggested options for variable levels of affordability (e.g., 60%, 80% or 100% of Average Market Rents) tied to a range of number of affordable units required (e.g. fewer units required if deeper levels of affordability are being achieved). Some suggested the affordable units should be accessible to specific populations, potentially through partnerships with non-profit housing providers, including indigenous individuals and households, people with disabilities, and seniors.

Definition of Affordable

Proposed Policy Direction: Affordable rents would be based on 100% of city-wide average market rents by bedroom type, inclusive of utilities, which is the current Official Plan definition. A new definition of affordable ownership price is proposed to mean housing which is priced at or below an amount where the total monthly shelter cost does not exceed 30 percent of gross annual income for households within the moderate income range (30th to 60th income percentile, depending on household size). City staff were directed in 2016 to report on further amendments to the Official Plan affordable ownership housing definition in conjunction with Inclusionary Zoning.

Feedback: Many stakeholders and members of the public suggested an income-based definition of affordable, as the existing definitions are not truly "affordable" and not reflective of what households can actually afford.

This feedback will help to inform the development of new Official Plan definitions of affordable rental housing and affordable ownership housing, which are expected to be brought forward in 2020.

Incentives

Proposed Policy Direction: No financial incentives would be provided by the City, as policy requirements are calibrated to ensure project viability can be maintained without municipal financial contributions.

Feedback: Some, particularly development industry stakeholders, wanted the City to provide incentives, such as waived planning fees, reduced development charges and streamlined approvals, as part of the policy framework to reflect a true partnership approach. Others suggested that incentives should only be provided where affordability depth or the affordability period is enhanced.

Other Feedback

Inclusion: Some stakeholders and members of the public suggested that the Official Plan policies should include overarching principles to ensure integration between the affordable units and market units and to ensure affordable and market units would be indistinguishable. This could include ensuring common elevators, main entrances and amenity spaces are shared between the market and affordable units.

Rights-based approach: In consultations undertaken with equity seeking groups and vulnerable populations, some expressed that the proposed policy directions could better reflect a rights-based approach and recommended a people-centered IZ policy that includes consideration for those most vulnerable in the city.

Non-profit partnerships: Many suggested exploring and leveraging partnerships with non-profit housing providers to implement and administer the affordable rental and ownership units.

Transition: Many development industry stakeholders and housing advocates identified that a clear transition period should be laid out to allow land values to adjust and to support continued project viability for projects where land was recently transacted.

Related Initiatives

The City is undertaking a range of initiatives to address housing needs in Toronto. These include the HousingTO 2020-2030 Action Plan, the Poverty Reduction Strategy Action Plan, Housing Now, Open Door Program, and a review of options to increase housing options and planning permissions in areas of Toronto designated as Neighbourhoods in Toronto's Official Plan. Inclusionary Zoning was raised frequently throughout consultations on the HousingTO 2020-2030 Action Plan, with many members of the public and stakeholders providing similar input to what was heard through the Inclusionary Zoning consultations. The HousingTO Action Plan will identify Inclusionary Zoning as one of the tools that the City will advance to help achieve City's affordable housing targets.

These initiatives involve a coordinated multi-pronged approach across City Divisions. An Interdivisional Housing working group, chaired by the Deputy City Manager is coordinating the advancement and delivery of these initiatives, including the development of Official Plan policies for Inclusionary Zoning.

Next Steps - Bill 108 Regulations

The City's background financial impact analysis and proposed policy directions for Inclusionary Zoning were developed prior to the introduction of Bill 108 in the provincial legislature in May 2019. Bill 108 made changes to the *Planning Act* that limit where municipalities can implement Inclusionary Zoning to either Protected Major Transit Station Areas (PMTSA) or areas where a Development Permit System has been ordered by the Minister. Previously under Bill 7 (the Promoting Affordable Housing Act, 2016), municipalities were able to determine the areas where inclusionary zoning would apply. PMTSAs are areas surrounding and including an existing or planned higher order transit station that have a very detailed implementation framework in accordance with Section 16(15) of the *Planning Act*. This framework is subject to approval by the Minister of Municipal Affairs and Housing and must identify the number of residents and jobs per hectare, permitted uses and minimum densities with respect to buildings and structures in the area. Additional information on Major Transit Station Areas and PMTSAs can be found in the report (dated September 30, 2019) from the Chief Planner on the Growth Plan (2019) requirements. The report can be accessed at this link: <http://app.toronto.ca/tmmis/viewAgendaItemHistory.do?item=2019.PH9.2>

Bill 108 also introduced changes to replace Section 37 of the *Planning Act* with a new community benefits authority that combines development charges for growth-related parks and capital infrastructure, parkland and community benefits. Previously, municipalities were permitted to use Section 37 with Inclusionary Zoning. Details of the new community benefits authority under the *Planning Act* have yet to be outlined in a provincial regulation. The new community benefits authority may impact the Inclusionary

Zoning financial impact analysis findings. For example higher or lower inclusionary zoning requirements than what was outlined in the proposed policy directions may be feasible as a result of the new community benefits framework. As a result, work on the Inclusionary Zoning policy framework cannot fully advance until the provincial regulation is issued and any required further analysis is completed to reflect the new community benefits authority in the Inclusionary Zoning Assessment Report.

Once the regulation is issued, staff will continue to advance work on Inclusionary Zoning, including developing a draft policy framework based on work completed to date and feedback received through the public consultations. Staff will continue to request that the Province allow the City to implement Inclusionary Zoning in areas beyond Protected Major Transit Station Areas.

This report recommends that the consultation feedback summarized herein and included as Attachment 1 to this report be used to inform the development of a draft Inclusionary Zoning policy framework and that staff report back with draft Inclusionary Zoning Official Plan policies as soon as possible following the issuance of provincial regulations on the community benefits authority and the completion of any necessary additional analysis for the required Inclusionary Zoning Assessment Report. Further public consultation on a draft Inclusionary Zoning policy framework would be undertaken prior to a final recommended Official Plan Amendment being brought forward.

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SIGNATURE

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City Planning Division

ATTACHMENTS

Attachment 1: Consultation Summary
Attachment 2: List of Key Stakeholder Groups for Consultation

Attachment 1: Consultation Summary

(Attached separately as a PDF)

Attachment 2: List of Key Stakeholder Groups for Consultation

Development Industry Stakeholders

- Building Industry and Land Development Association (BILD)
- Diamond Corp
- Daniels Corporation
- Hullmark
- KingSett Capital
- Menkes Developments
- MOD Developments
- RioCan
- Rockport Group
- Tribute Communities
- Tridel
- Urban Land Institute Toronto

Non-Profit Housing Developers and Providers

- Ontario Non-Profit Housing Association (ONPHA)
- Artscape
- Habitat for Humanity
- Kehilla
- New Commons Development
- Options for Homes
- St. Clare's
- Trillium Housing
- Wigwamen
- Woodgreen Community Services

Housing Advocacy Groups

- Association of Community Organizations for Reform Now (ACORN)
- Centre for Equality Rights in Accommodation (CERA)
- Co-Op Housing Federation (CHF)
- Community Advisory Board, Aboriginal Labour Force Development Circle
- Convent Toronto
- Dream Team
- Homecoming Coalition
- Parkdale Neighbourhood Land Trust
- Parkdale People's Economy
- Social Planning Toronto
- Toronto Alliance to End Homelessness (TAEH)
- West Neighbourhood House

Renters, Tenants Associations and Community Associations

- Advocacy Centre for Tenants Ontario (ACTO)
- Federation of Metro Tenants' Associations (FMTA)
- Tenants Associations
- Community and Resident Associations

Academics and Think Tanks

- Evergreen Housing Action Lab
- Maytree Foundation
- Ryerson Centre for Urban Research and Land Development
- University of Toronto, Centre for Urban and Community Studies
- University of Toronto, Munk School of Global Affairs and Public Policy
- Wellesley Institute

City of Toronto Panels and Advisory Groups

- Planning Review Panel
- Design Review Panel
- Lived Experience Advisory Group

Inclusionary Zoning Expert Advisory Table

- David Amborski
- Paul Bedford
- Martin Blake
- Shauna Brail
- Alan Broadbent
- Ruth Crammond
- Michelle German
- David Hulchanski
- Kwame McKenzie
- Peter Milczyn
- Benjamin Tal

Do-It-Yourself Workshops

- Women's Habitat of Etobicoke
- Voices of Scarborough
- Parkdale People's Economy and West Neighbourhood House
- Social Assistance Coalition of Scarborough
- Yonge Street Mission and Friends Helping People End Poverty
- LAMP Community Health Centre
- Justice Makers
- Family Services Toronto, Transitional and Housing Support Program Network
- Scarborough Rosewood Community Association
- Lawrence Heights Civic Action Group