



Committee Chair & Members
Planning & Housing Committee
City of Toronto
100 Queen Street West
Toronto, Ontario
M5H 2N2

September 22, 2020

Dear Chair and Members:

Re: **PH 16.7 Inclusionary Zoning Draft OPA and ZBA**
Request to exempt Retirement Residences Licenced under the Retirement Homes Act, 2010.

We are writing in respect of the City of Toronto's staff report and recommendations on Inclusionary Zoning ("I Z"). **It is our submission that Retirement Residences, to be licenced under the Retirement Homes Act, 2010, as amended, be exempted from the I Z policy.**

Rockport is a very active City of Toronto land developer involved in producing affordable and market rental housing, condominium development, and has developed several retirement residences in the City and throughout the GTA.

Retirement residences predominantly serve the oldest members of our community and the average age of residents in the homes we are involved in is over 85.

The buildings generally consist of what the City by law considers Dwelling Rooms, together with substantial facilities which accommodate day to day living including meal services in a communal dining setting, social programming and care related facilities and amenities. Many of the residences offer very specialized memory or Alzheimer care, assistance with the needs of daily living and other health promoting services. All homes employ Personal Support Workers, and many have nursing professionals on staff.

All residents pay for services and meals, in addition to the cost of their basic accommodation. The variable monthly costs depend upon the health and care needs of the resident, and they change as the residents age. **The costs or charges for these services have nothing to do with the income of the resident.** As staff have positioned I Z on the basis of income, the policy is inappropriate to be brought to bear to retirement residences.

Retirement residences are operating service businesses in a residential like building; private operators cannot accommodate the pricing that would be necessary to meet the I Z policies. **For Condominium or rental housing developers I Z is a calculable cost of doing business. That cannot be done when trying to forecast ever changing care needs and other services in a retirement residence.**

Aging Baby Boomers are going to require many more retirement residences in Toronto. The industry has great difficulty competing for land as it is. Given the staffing required, operators want to locate in areas well served by transit. **I Z does not work in the Retirement residence context.**

Thank you for the opportunity to submit our concerns to you. Please feel free to contact the undersigned if you have any questions.

Yours very truly,

Rockport Group

Jack Winberg
C.E.O.