



October 26, 2021

Re: PH28.1, Thursday, October 28, 2021

Dear Mayor Tory and Toronto City Councillors,

I am writing to you from Habitat Services, a non-profit organization that has contracts with private sector and not for profit housing providers in the City of Toronto. The landlords we fund provide deeply affordable housing to individuals with mental health challenges. Our referrals to these accommodations come from the central Access Point for supportive Housing, which has a wait list of approximately 20,000 applicants. As such, we are acutely aware of the desperate need of deeply affordable housing in the City of Toronto. For this reason, Habitat Services would like to add its voice to a broad coalition of housing advocacy organizations and research organizations in calling on the City of Toronto to implement a strong Inclusionary Zoning policy, based on the findings of the City's own feasibility studies.

We believe that the City can strengthen their proposal in a number of ways. The most recent City commissioned study (2021) found that, after leaving developers with a motivating 15% profit margin and land vendors with 10% above the current value of their land, typical condo developments could be required to include:

- 30% of their floor area as affordable rental in Downtown and Toronto West
- 20% of their floor area as affordable rental in Toronto East, Yonge-Eglinton Centre, and North York Centre
- 10% of their floor area as affordable rental in Scarborough Centre, Finch West, and Stockyard/Junction

The study also found that, after leaving developers and landowners this return, typical purpose-built rental developments could be required to include:

- 20% of their floor area as affordable rental in Toronto West
- 10% of their floor area as affordable rental in Downtown
- 5% of their floor area as affordable rental in Yonge-Eglinton Centre and Stockyard/Junction

Thus, requirements could be set **nearly twice as high** as the City is proposing to raise them by 2030, while still leaving developers a 15% profit margin and landowners 10% above the current value of their land. We implore City Councilors to support an Inclusionary Zoning policy that follows the evidence in order to mitigate the City's housing crisis.

We also urge the City to ensure that the incentives for developers embedded in Inclusionary Zoning requirements are no greater for the creation of affordable home ownership units than they are for the creation of affordable home rentals units. While affordable home ownership is also desirable, affordable rentals are of great urgency in the current climate.

The lack of affordable rentals in the City puts further pressure on the narrow market serving Torontonians who need ***deeply affordable*** housing. Though Inclusionary Zoning regulations alone will not resolve the needs of those who need ***deeply affordable*** housing, a significant and meaningful influx of affordable rental units would help relieve the increasing pressure on rents at the low end of the market. It would also go a long way to supporting the City's HousingTO 2020 – 2030 Housing Plan. Inclusionary Zoning is a critical element in a multi-pronged approach to resolving the City's deepening housing crisis.

Sincerely,

Joanne Knutson,  
Executive Director  
Habitat Services  
[jknutson@habitat-services.org](mailto:jknutson@habitat-services.org)