



RE: PH28.1 - Inclusionary Zoning Official Plan Amendment, Zoning By-law Amendment and Draft Implementation Guidelines

Dear Planning and Housing Committee,

We are writing as the Jane Finch Housing Coalition to share our disappointment in the new draft Inclusionary Zoning (IZ) policy. The Jane Finch Housing Coalition (JFHC) is a coalition of Jane-Finch residents, grassroots groups, service providers, and community organizers working towards housing justice and housing equity in the Jane-Finch area in Tkaronto (Toronto). JFHC's focus is to bring awareness to ongoing and emerging housing issues, educate and support community members in exercising their housing rights, as well as encourage engagement in urban/community planning processes and housing advocacy.

We are grateful to know that the City of Toronto will be finally implementing inclusionary zoning, but given its shortcomings, this policy will unfortunately not achieve its goal of providing deeply affordable housing and alleviating our affordable housing crisis.

First, the City's own feasibility studies conducted by NBLC in 2019, 2020, and 2021 show that 20-30% affordable housing set aside rates in new developments are possible in many parts of the city. Given that the pandemic only made the housing crisis worse, and that real estate development continues to be strong across the city and increase rapidly near new transit investments in racialized communities, we are appalled to see the City is proposing such low set-asides.

It is difficult to be convinced that NBLC's updated feasibility study (proposing set-aside rates for affordable rental housing that start at 5%-7% and only reach a high of 16% in 2030) is grounded in the realities of the current housing crisis. Is this updated feasibility study reflecting the urgent housing needs of our lower-income communities or adhering to pressures from developers?

Based on the proposed IZ policy, Jane-Finch will have to wait until 2030 (nine years) to receive a meager 8% affordable housing set aside for rental developments and 11% for affordable ownership. Toronto likes to see itself as world class. If major cities like New York, Montreal and London, England have been able to achieve 25%-50% affordable housing units in new high-rise housing developments, why would a world-class city like Toronto not be able to implement more ambitious rates now and over the coming years?



Second, we know that the inner-suburban communities experiencing major transit investments are also facing growing eviction rates. In fact, Jane-Finch has one of the highest eviction rates in the city, and waves of local residents have been experiencing displacement over the last ten years. These rates run parallel with increasing property speculation, in conjunction with recent investments like the Finch West LRT and University-Spadina Subway Extension.

The IZ policy and its affordable housing targets should be more forward-thinking and based on the market changes that we are expecting to see around new transit lines, not just on the current economics of development. Both the Province of Ontario and City of Toronto have directed significant public investments to building transit in our communities, which developers will reap the benefits of in terms of increased land values and assets. But yet, this proposed policy does little to share these benefits with local residents, reduce the negative impacts of growth and development on low-income neighbourhoods, or deliver real affordable housing.

We urge you to ask yourselves again why you are leaving communities who are seeing major public transit investments and rapid growth and development off the map - communities like Weston, Mount Dennis, Rexdale, Little Jamaica, Flemingdon, and Thorncliffe Park and many parts of Scarborough. These are communities that are historically marginalized, where racialized poor have been neglected by housing policies time and time again.

Lastly, the City's Housing Action Plan's 10th key strategic action is to "Create New Rental Housing Response to Residents Needs," citing that "some 80,000 new condominium homes opened in the last five years compared to just 4,500 purpose-built rental homes." We are concerned that developers are being given the choice to build either affordable ownership homes or affordable rental, and that this choice will lead them to build ownership over rent, in order to make more profit. It is evident that many communities in the inner-suburbs may never be able to afford a home in this city, and that more purpose-built affordable rental housing is urgently required to meet housing needs now. There are several other areas of the Housing Action Plan 2020-2030 that this proposed IZ policy does not align with and we encourage you to review it for gaps.

In light of the reasons stated above, we demand the following from City Council:

- 1. Raise set aside rates to 30% for all new developments**
- 2. Implement a shorter phase-in of affordable housing requirements**
- 3. Expand deeply affordable housing units** (including RGI units) across all new developments, work closely with non-profit organizations to manage them, and make these units available to residents on social assistance or making minimum wage



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- 4. IZ policies should apply to all new developments with 60 units or more**
- 5. Ensure all new developments stay permanently affordable**
- 6. Ensure local tenants who live close to new developments are prioritized** for affordable housing units (both rental and condo) in their neighbourhoods
- 7. Extend the IZ policy to low and moderate market areas** near major transit stations and investments where neighbourhoods are already seeing displacement and gentrification
- 8. Apply pressure on the Province of Ontario** to expand Inclusionary Zoning geographies to all parts of the city

Jane-Finch and other low-income, racialized communities have desperately needed more affordable housing for decades and this need is only going to be exacerbated by upcoming growth and development brought on by new transit.

Are you committed to solve our affordable housing crisis or will you continue to only support token, band-aid solutions?

Sincerely,

Jane Finch Housing Coalition

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