

Submission to Toronto City Council
By
Regent Park Neighbourhood Association

Submitted by Walied Khogali Ali

Mailing Address:

Attention: RPNA

585 Dundas Street East – 3rd Floor –

M5A 2B7

To: Mayor John Tory and members of City Council.

As noted in RPNA's submission at the Ontario Land Tribunal regarding OPA 558. "RPNA is an incorporated not-for-profit organization with offices located in the Regent Park neighbourhood of Toronto. It was formed in 2015 in response to significant redevelopment of the Regent Park neighbourhood, wherein Canada's first and largest social housing community was developed into a high density, mixed-income neighbourhood intended to provide a mix of Rent-Geared-to-Income housing, affordable rental housing, market rent housing, and home ownership. RPNA employs one staff coordinator and is otherwise volunteer-run, with its membership equally representing people living in "affordable" housing units (ex. RGI units operated by Toronto Community Housing) and "market" residents, including those who pay market rents and homeowners.

RPNA's mandate as established in its terms of reference is to "...foster an inclusive, diverse and healthy neighbourhood in which all residents feel safe, welcome and at home." The organization takes equal direction from residents living in "affordable" housing units and "market" residents. A major focus of its work has been to create and maintain sustainable mixed-income communities in Regent Park and its surrounding neighbourhoods in Toronto's downtown east. RPNA has a direct interest in ensuring that there are affordable housing options in these rapidly-changing neighbourhoods, and in ensuring that the definition of "affordable housing" is aligned with the needs and interests of its constituents.

RPNA's membership is reflective of the diverse racial and socio-economic demographics of Regent Park and Toronto's downtown east communities. Its membership is largely comprised of Black and racialized community members, particularly newcomers, who disproportionately experience low incomes and poverty. This includes people in receipt of social assistance and disability support, pensioners, students and low-wage workers. They are at greatest risk of displacement due to lack of housing affordability and

they are most affected by rent burden. RPNA's membership and constituency are representative of the groups who are most directly affected by OPA 558

Interest and Experience

RPNA has a long history of advocating around the issues raised in this Bill, particularly as they relate to housing affordability. RPNA was closely involved in advocating for the "right of return" of those Regent Park residents who were displaced as a result of the redevelopment of the neighbourhood, and who wished to exercise their right to return to the neighbourhood and their affordable units.

RPNA and its members have participated in numerous consultations with the City of Toronto concerning inclusionary zoning and definitions of affordable housing, and in particular have been long standing advocates of an income-based definition of affordable housing. Specifically:

a. On August 27, 2019, RPNA members participated in "What is Inclusionary Zoning" a community consultation to gather input for the city on inclusionary zoning, an initiative to improve access to affordable housing held by Yonge Street Mission and Friends Helping People End Poverty;

b. On November 29 2021 RPNA members participated in "Opportunity to influence City of Toronto's 'Official Plan', a consultation with the Local Champions Network - an autonomous group of skilled, passionate community builders from across Toronto's Neighbourhood Improvement Areas and Emerging Neighbourhoods.

Since 2018, RPNA members have actively participated in consultations with Toronto Community Housing Corporation ('TCHC') around Phases 4 and 5 of the Regent Park Revitalization Project. This includes:

- Participating in the selection process for a private partner to join TCHC in this project in 2019;
- On June 9, 2022, RPNA members attended consultations with City of Toronto staff around the rezoning application by TCHC/Tridel to revise the secondary plan for phases 4 and 5;
- Engaging in regular discussions and negotiations around provision of affordable housing in the new development.

The outcome of this bill will have a direct impact on the nature of affordable housing units secured through this advocacy.

RPNA also has experience in securing Section 37 community benefits, an issue raised by several of the Appellants. This includes provision of affordable housing units. As the lead partner of the Regent Park Community Benefits Coalition - RPNA secured over \$26.8 million in community benefits for Phases 4 and 5, and regularly participates in consultations surrounding community benefits in new developments throughout the community.

The outcome of this bill will have a direct impact on RPNA's advocacy around s. 37 benefits and in particular any affordable housing units secured as a community benefit.

RPNA also notes that the National Housing Strategy, a ten-year, \$70 Billion federal plan to fund the development of hundreds of thousands of new housing units, will ultimately channel funding for housing initiatives through provinces and municipalities. As a result, the definition of “affordable housing” established in Bill 23 and OPA 558 will have a direct impact on the implementation of the National Housing Strategy in Toronto. RPNA has a direct interest in ensuring that these “affordable” units are in fact affordable to the people for whom they are intended.

Regent Park is adjacent to the future site of a new subway station to be built in Moss Park as part of the Ontario Line extension project. The creation of this subway station will lead to significant redevelopment in Moss Park and the vicinity, and will have a direct impact on housing development, as well as prices and affordability in neighbouring Regent Park. RPNA intends to actively participate in consultation processes around the construction of this subway station and ensuing development, which will have an affordable housing component directly affected by OPA 558.

RPNA has an established history of advocacy around, and an interest in, affordable housing in Toronto. The organization has been an active participant in numerous public consultation processes which engage, directly and indirectly, OPA 558 and Bill 23.

Perspective on Issues:

RPNA brings a unique perspective on the issues raised in this Bill and supports the submission by the coalition for inclusive development that emphasizes that the “coalition consisting of over 40 different

grassroots, community, and tenants groups actively working for housing justice in Toronto. Coalition members including Oakwood-Vaugh Community Organisation, Friends of Kensington Market, Regent Park Neighbourhood Association, ACORN, and others had signed up to appear before the Standing Committee, reflecting the high level of interest in Bill 23. As your constituents, we are paying attention. The legislation changes proposed in Bill 23 deeply impact the building and housing sector in Ontario, and will shape whether complete, inclusive and equitable communities can be strengthened in the neighbourhoods across the City our Coalition supports.

Whereas we do welcome provincial efforts to grapple with the affordable housing crisis, new initiatives designed to make progress on affordable housing are of limited effectiveness, when other provisions are detrimental to existing solutions in Toronto. This bill takes important steps that may expand supply, including create new units of affordable housing. One important step is reducing development charges and providing tax breaks for non-profit development to lower costs and make more projects viable. As-of-right permissions for secondary suites should remove some barriers to new, and potentially more affordable homes. We appreciate the balanced approach that is being sought in this Bill, but have concerns as to where it falls short in doing so.

Unaddressed, the concerns outlined here threaten overall net gains in affordable housing stock, contravening the goals of this legislation which Ontarians deeply share as we experience the losses, displacement, and hardships of an ongoing housing crisis.

- 1) **Bill 23 dismantles protection offered by City of Toronto bylaws to existing affordable housing supply and acts as a greenlight for mass evictions from naturally occurring affordable units.** Such units, that have historically housed lower-income households, are often rented for lower than what for-profit developers can try to build right now. Without our by-laws, tenants may no longer have the right to return to a unit at a similar rent after a demolition. Tenants may also lose their

right to a compensation package. It is alarming that this Bill creates incentives to demolish about half our existing stock of affordable housing. Without these rights protected, the “math” of demolition for new/redevelopment will now make sense and we risk losing over 300,000 units in Toronto alone, units which we simply cannot build fast or price cheaply enough to replace. In 2022, Council approved 28 residential demolition/ conversion applications. Thanks to these regulations, the City was able to require the applicants to replace 907 rental units (485 of them affordable rental units) that would otherwise have been lost as well as provide 916 tenant households with assistance in finding and affording new accommodations. This meant more than 1357 individuals assuming individual bedroom occupancy at the minimum saving their homes. The value to the City was at least \$41.5 million dollars last year alone. The Bill does not provide provincial assistance to replace the financial impact of removing the bylaws, leaving tenants out in the cold to fend for themselves when they are evicted by landlords and property owners.

- 2) **Bill 23 erodes municipal programs that create affordable housing.** Eliminating the charges that developers currently pay toward housing programs will, according to recent estimates, eliminate hundreds of millions of dollars. Waiving development charges for any purpose-built rental, regardless of affordability levels, with no clear replacement of revenue for municipal services needed is a misguided, blunt application of this legislative tool. Without development charges for housing services which currently support creating new affordable homes and other affordable housing programs in Toronto, municipal resources for affordable housing will suffer a reduced budget. With municipal ways of raising revenue even more limited, critical infrastructure or needed services will be at risk, without putting significant pressure on the property tax base of your constituents here. While lower taxes and reduced regulatory requirements may lead developers to offer homes at less than the current market rates, this bill clearly weakens

expectations and any requirements they do so. The bill ignores the most important task in creating affordable housing: **new investment**. Of note, the bill further constrains municipal efforts to require affordable housing in new developments. The new limits on Inclusionary Zoning (IZ) are well below the targets in bylaws that local governments across Ontario have already passed – policies based on local economic feasibility studies the Ministry required and in line with market factors. It is worth underscoring that Inclusionary Zoning bylaws are one of the only ways municipalities have to create much-needed affordable housing for people experiencing housing precarity across Ontario, and this tool was already restricted by the province to PMTSAs. We strongly object to the province attempting to establish IZ set asides capped to a maximum of 5% and reducing the affordability period to 25 years. This contravenes previous provincial policy commitments and directions to allow municipalities to establish appropriate IZ targets based on the strength of local markets. City of Toronto Council passed a 5-15% IZ set aside rates with a 99 year period of affordability as important, economically viable targets. We urgently call on the provincial government to revert back to its prior position, respect decisions already made at the municipal level, and approve Toronto’s designated PMTSAs without delay so our IZ policy can finally come into effect after years of waiting. These new caps represent another loss of hundreds of millions of dollars from municipal investments in affordable housing, as well as cancel plans that would have built thousands of new, permanently affordable homes. Nothing in Bill 23 ensures that new homes, built with public incentives, are affordable.

- 3) **Bill 23 undermines levers for oversight and accountability by communities most impacted over when our neighbourhoods transform.** Curtailing the right to participate at the Ontario Land Tribunal by resident, environmental, and community groups is deeply concerning. Current

processes for participation acknowledge the often valuable information and needed expertise groups. While we understand the goal of reducing unwarranted opposition and delaying needed density development, the role of groups, like many of our Coalition members, is also to provide informed input that ensures new development is appropriate to needs of existing community members, including those under engaged by planning processes and most vulnerable to displacement caused by development/ redevelopment. By restricting who can be present, instead of providing more supports for groups to participate meaningfully, the Tribunal is now designed to dismantle decision-making through existing local democratic processes.

4) **Bill 23 is reversing climate mitigation, along with municipal rights to make decisions.**

Preservation of the Green Belt is intended to protect not only the environmental impacts of sprawl, but respects the need for municipalities to have autonomy in determining their boundaries and planning responses at a local level. We note with concern the trammelling of Toronto's climate mitigation planning, as well as removing important protections for wetlands, woodlands, and environmentally sensitive areas. Without Toronto Green Building Standards, Toronto won't achieve our climate targets or have a plan anymore. These standards were the result of extensive public dialogue, consultation and engagement with communities by the City of Toronto, this is yet another area where Bill 23 subverts and undermines successful democratic practices in favour of provincial control outside of existing jurisdictions.

While regulatory reform is useful, and encouragement of more supply is warranted, Ontario's housing crisis is not successfully addressed in Bill 23. As the government's third legislative initiative on housing, there is no coherent investment plan which would enable public, private, or non-profit sectors to build the amount of affordable and deeply affordable housing needed. The single most important measure the

province can take to keep housing affordable is restoring vacancy control, which is not only missing here, but undermined as the new Bill will move further away from expecting developers to do their part contributing to housing solutions.

We urge you to immediately reassess the current legislation, amend provisions identified here, and prioritise the needed focus on investing in affordable and deeply affordable housing. “

We agree with the neighbourhood group that one central concern is the ⁱⁱ“elimination or weakening of rental replacement rules in this bill. This change would lead to rapid affordable rental loss and could result in homelessness for many families. Municipalities such as Toronto have put in place bylaws to prevent this loss of much needed affordable housing, and we urge you to protect these rules. To date, the City of Toronto has been able to save more than 4,000 affordable rental units which would otherwise be lost through redevelopment.”

The Regent Park Neighbourhood Association supports the call made by the coalition, many organizations, municipal governments and residents of Ontario who call for Bill 23 to be repealed in favour of working with municipalities and other stakeholders to invest in building public and accessible social housing.

Thank you for accepting and reviewing the submission.

ⁱ Retrieved from the submission made by the Regent Park Neighbourhood Association on October 25th : OLT-21-001844 - Regent Park Neighbourhood Association - Request for Party Status.

ⁱⁱ Written Submission on Bill 23, More Homes Built Faster Act November 16, 2022 by the Neighbourhood Group’s President Bill Sinclair.