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Planning & Housing Committee
Toronto City Hall
100 Queen Street West
Toronto, ON M5H 2N2

RE : PH6.3 - East Harbour Employment Area Conversion Request - Final Report

Members of the Planning & Housing Committee,

Our **HousingNowTO.com** civic-tech volunteers – many of whom live in the wards near the East Harbour site – have attended almost all of the public-meetings with City Planning, Infrastructure Ontario, Metrolinx and Cadillac Fairview (Ontario Teachers Pension Fund) over the last 3-years. Our volunteers, along with other community members were also invited participants in the East Harbour Local Advisory Committee (LAC) in 2021 & 2022.

We support the creation of this new Transit-Oriented Community on this large parcel of former industrial lands at East Harbour – and the recent use of a minister’s zoning order (MZO) to expedite the redevelopment of this site, which removed any avenue for an OLT appeal.

At this time, we support Council passing a simplified official plan amendment that would ***designate all of the East Harbour Lands as 'Mixed Use Areas'*** to allow for the organic development of a mixed-use community between the new transit hub – and the City’s redevelopment district in the Port Lands located south of East Harbour.

It is important to note this staff report is clear that the East Harbour development will include an affordable housing allocation that is fully consistent with City of Toronto policy and practice – and will be delivering a minimum of 215 x affordable rental units for a period of 99-years.

Our volunteers will continue to encourage Cadillac Fairview (Ontario Teachers Pension Fund) to find models to go above and beyond that prescribed unit-minimum in the current agreement – with a particular focus on Cadillac Fairview working with government, union and non-profit partners to create additional units of “workforce housing” at East Harbour which would be affordable on the average incomes of entry-level early childhood educators (ECE), and new first-year teachers within our local Toronto school boards.

For the purposes of clarity and transparency, however – we do have some concerns with the chart of the “**Potential Affordable Units**” that staff were asked to include on page 13 of their report. The loose definition of a “Potential Unit” could easily be misinterpreted by a casual reader, or member of the media.

The scenarios provided for East Harbour in the following table are for information purposes only, to illustrate the number of affordable housing units that could have been secured if 20% affordable units or the Housing Now standard of 30% affordable units had been required based on all 4,300 units being proposed as condominium units. It should be noted that both options would require significant City capital contributions and incentives to achieve the targets.

	Number of Potential Affordable Units
20% of Units as Affordable (based on the City's Large Site Policy, which requires land to accommodate 20% of units)	860
30% of Units as Affordable	1290

Highlighted Extract from - <https://www.toronto.ca/legdocs/mmis/2023/ph/bqrd/backgroundfile-239261.pdf>

Using the HOUSING NOW, or 'Large-Sites Land Conveyance' models for affordable housing unit delivery as comparisons at East Harbour is missing the other affordable housing scenarios in the City's large sites policy – and is not clear about the additional risk and responsibility for the actual delivery of the affordable housing units that would be assumed by the City via the land conveyance.

	Potential affordable housing mechanisms from Large Sites Policy	Affordable Unit-Count	Unit Delivery Risk & Responsibility carried by the City
1	The <u>conveyance of land</u> to the City sufficient to accommodate 20% of the residential gross floor area.	860	High Responsibility / Long Term
2	The provision of 10% of residential gross floor area as purpose-built rental units with affordable rents <u>secured for a period of no less than 20 years.</u>	430	Low Responsibility / Medium Term
3	The conveyance to the City of 5% of the residential gross floor area as purpose-built rental units or affordable ownership units.	215	Low Responsibility / Long Term

As always, our open data and civic-tech volunteers are happy to answer any questions the committee or city staff may have on affordable-housing development best practices – and how to make most effective use of Transit-Oriented Lands to help alleviate Toronto's rental-housing crisis.

Yours,



Mark J. Richardson
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