

Speaking Notes for Inclusionary Zoning Deputation (October 28, 2021)

My name is Elin Goulden, and I am the Social Justice & Advocacy Consultant for the Anglican Diocese of Toronto, representing the Social Justice & Advocacy Committee and Housing Advocacy subcommittee of the Diocese. Thank you for the opportunity to address this committee today.

Affordable housing is one of our key social justice concerns as a Diocese and has been a focus for our advocacy at every level of government for well over a decade. At the same time, we have watched as housing has become increasingly unaffordable for lower- and middle-income households across our Diocese, and especially in the City of Toronto. Almost half of tenants pay over 30% of income on shelter, and 23% are paying over 50%. We are therefore very glad to see the City of Toronto proposing to adopt an Inclusionary Zoning policy.

We are encouraged to note that the proposed affordability period has been increased to 99 years, securing affordability for the long term. We are also pleased to note that the City's proposed by-law and Official Plan amendments have adopted an income-based definition of affordability rather than a definition based on a percentage of market rent. Given that housing costs in our city have far outstripped the rate of inflation, an income-based definition is necessary to make housing truly affordable.

As welcome as these measures are, we believe the proposed IZ policy could be made even stronger and more effective, and that this is necessary to address the depth of the housing crisis in the city of Toronto. We urge you to consider the following arguments

- 1)** We believe the **overall set-aside rates** are far too low. The City's plan only requires a set-aside of 5-10% of new condo developments with more than 100 units in the highest market area, depending on whether the development is in Market Area 1, 2 or 3 and whether the units are set aside as affordable ownership housing or rental housing. While this amount is set to increase incrementally between 2025 and 2030, its starting point is still too low. A recent Maytree study concluded that in high value areas, "as-of-right" development could be financially viable with 22-25% of units set aside as affordable, and developments requiring re-zoning could be financially viable with 35% or more units set aside as affordable. Granted, the Maytree study defines affordability as a percentage of average market rent rather than based on income. However, we believe that the set-aside rates should start at 20-30% for the highest value areas (Market Area 1) and be adjusted accordingly for Market Areas 2 and 3.

Near where I live in the West End, which is Market Area 2, a community group recently won a commitment from the developer of the Dufferin Mall Tower to set aside over 10% of new units in the development as affordable for 99 years. This is good news; but it should not have had to take a year of organizing and legal action by the local community to bring it about. It should also not take until January 2026 until that threshold takes effect for all new developments in Market Area 2.

- 2)** Secondly, we are concerned that the set-aside rates for **rental housing** are too low. The greatest housing need in the City of Toronto is for affordable rental housing. The set-asides for

affordable rental units in new condo developments are lower than for affordable ownership units; the set-asides for purpose-built rental housing are still lower, with a mere 3-5% of new purpose-built rental developments set aside starting in 2026, with no incremental increases proposed. Low and moderate-income tenants in Toronto cannot wait so long for so little. We urge the City to bring in inclusionary zoning for purpose-built rental units at the same time as for condo developments and to set aside as many affordable units as possible in these developments. The City should also consider whether incentives could work to make a greater number of affordable units in purpose-built rental developments financially viable.

- 3) We also propose that the Inclusionary Zoning policy apply to **all developments of 60 units** or more.
- 4) Finally, while we recognize that provincial legislation limits the areas in which municipalities can apply Inclusionary Zoning, we urge the City to adopt an Inclusionary Zoning policy that can be expanded to other geographic areas of the City experiencing rapid development, especially as new transit infrastructure is constructed. We also urge the City to join us in continuing advocating with the Province to extend Inclusionary Zoning powers to all geographical areas in the City.

The depths of Toronto's housing crisis are such that the most robust policy measures are required to create the affordable housing Torontonians need.

Thank you for allowing me the opportunity to present today.