

Hon. Steve Clark

Minister of Municipal Affairs and Housing 17th Floor, 777 Bay Street

Toronto, ON M7A 2J3

Dear Minister Clark,

RE: ERO 019-6173 – Proposed Amendment to O.Reg 232/18: Inclusionary Zoning

More Neighbours Toronto is a volunteer-only organization of housing advocates that believe in building more homes of all kinds for those who dream of building their lives in Toronto. We advocate for reforms to increase the ability to build more homes in every neighbourhood. We are a big-tent organization with members across the political spectrum who are committed to counterbalancing the anti-housing agenda that both dominates Toronto's politics and has created increased costs and environmental burden for a new generation of aspiring residents.

While More Neighbours welcomes the province-wide offset of eliminating development charges for affordable units, we do not believe this measure goes far enough. There are still many barriers to affordable housing and if the province truly wants to encourage the private sector to build affordable housing in Inclusionary Zoned areas, more red tape must be eliminated and more incentives/offsets must be offered.

More Neighbours Toronto has the following suggestions for developments within the Inclusionary Zone:

* Eliminate third party appeals. We are disappointed with the amendment to Bill 23 that returns third party appeals for zoning by-law and official plan amendments. These appeals are undoubtedly a barrier to affordable housing. We recommend eliminating them for developments with affordable housing to ensure they will get built.
* Density bonusing. Greater heights and more units can further offset the costs of providing affordable units, as well as provide more affordable units.
* Eliminate parking minimums. We are disappointed that Bill 23 did not eliminate parking minimums outright. Eliminating parking minimums for Inclusionary Zoning must be considered to help the viability of affordable housing developments.
* Pre-zone for mixed-use high-rise. By pre-zoning or allowing as-of-right, we can significantly reduce the turnaround time of development applications, effectively eliminating red tape.
* With the above measures, increase the set-aside rates and range of Inclusionary Zoning.

Simply eliminating development charges will not be enough to build an impactful number of affordable units, nor will it contribute significantly to 1.5 million units in 10 years. If more housing, whether it be market-rate or affordable, is the priority for the province, we must go further than what BIll 23 offers.

Sincerely,

Simon Tran

More Neighbours Toronto