

July 05, 2022

Planning and Development Committee Chair
Councillor George Carlson
Mississauga Civic Centre
300 City Centre Drive
Mississauga, ON L5B 3C1

Dear Members of the Planning and Development Committee,

RE: Inclusionary Zoning for Affordable Housing – Draft Official Plan Amendment and Zoning Framework

I am writing on behalf of the Right to Housing Peel Coalition on the matter of the City of Mississauga's staff recommendation report for an inclusionary zoning policy. We are a network of housing advocates working to advance the right to housing in the region. What brings us together is a shared belief that housing is a human right that must be advanced through policies, funding and meaningful engagement with communities.

We provided our recommendations for the proposed inclusionary zoning policy to the Planning and Development Committee on May 30th, 2022. While we appreciate the work that City staff has put in to developing an inclusionary zoning framework and presenting recommendations within a very aggressive timeframe, we are disappointed that the majority of the concerns expressed by our coalition, other housing organizations, and during public consultations were not adequately addressed within the staff recommendations. Given the severe housing affordability crisis that the City of Mississauga is experiencing, we believe there is much room for improving the inclusionary zoning proposal to increase the supply of new affordable housing units and ensuring that these units remain affordable in perpetuity.

Of particular concern with the current recommendations is the lack of prioritization of rental housing over ownership, which would benefit the housing needs of Peel residents who live on low- to moderate-incomes. The policy, in its current form, would drastically limit the potential creation of affordable rental units. As the policy applies to condominium or "ownership" buildings, it could be better calibrated to increase the likelihood of developing more rental housing. Currently, developers have the option of creating ownership units or rental units in the proposed framework. Set aside rates for ownership units are currently higher than rental units but we believe the rates for the former could be higher. By incrementally but significantly adding to the requirements for ownership units, developers could indirectly be encouraged to consider rental arrangements in the condominium market. In fact, your own third-party study has noted how Mississauga is a relatively well-developed condominium market, and some areas could absorb a policy with set aside rates higher than 10%, the maximum threshold currently articulated in the proposal. As such, we urge the City to reconsider the feasibility of more stringent standards.

We would also recommend that the 25-year affordability period required for rental options be extended. There is evidence that after this period the affordable stock will be lost, as has been the case in cities like Chicago. Other jurisdictions such as the City of Toronto have implicitly acknowledged this risk by instituting mandates for affordability that would last effectively into perpetuity. Ensuring that the

city has adequate affordable housing stock in the future will be greatly shaped by the decisions made today.

Since the financial gains from housing developments are not just a result of private finance but also a public investment in infrastructure and other amenities such as public transit, roads, sanitation system, and schools, it is not unreasonable to require developers to forgo a portion of expected profits by setting aside both rental and ownership units for affordable use in new construction. While adopting an inclusionary zoning policy is a positive step, we feel that a policy based on the current staff recommendations would produce limited affordable rental units through this initiative. Given the historically low vacancy rate in the city's rental market, affordable rental housing should be prioritized.

We are also aware that inclusionary zoning is just one of the tools available to the City and the Region to create more affordable rental options. We are especially keen to see the City consider options such as donating land to community housing providers and increasing financing to create deeply affordable housing options. These are the housing options that will most significantly benefit residents living on lower incomes.

We encourage the committee to think about inclusionary zoning and its broader menu of policy options through a rights-based perspective. This means prioritizing the needs of those most impacted by the housing affordability crisis and allocating the maximum available resources to solve this crisis.

Thank you for considering our recommendations. We look forward to providing our housing expertise and welcome further discussions.

Sincerely,

Sean Keddy on behalf of the Right to Housing Peel Region

A handwritten signature in blue ink that reads "Sean Keddy". The signature is written in a cursive style and is underlined with a single horizontal line.

Right to Housing Peel steering committee organizations:

Centre for Equality Rights in Accommodation (CERA)

Our Place Peel

Peel Alliance to End Homelessness (PAEH)

Newcomer Centre of Peel

University of Toronto Mississauga Campus Student Union

North Peel and Dufferin Community Legal Services (NPDCLS)

Mississauga Community Legal Services