



July 7, 2021

Acting Mayor DiPaola and Members of Council
City of Richmond Hill
225 East Beaver Creek
Richmond Hill, ON
L4B 3P4

RE: June 23rd Council Meeting - Agenda Item: 13.6 SRPA.21.052 – Request for Endorsement – Affordable Housing Strategy

Dear Acting Mayor DiPaola and Members of Council,

BILD is in receipt of the Staff Report for the Request for Endorsement of the Affordable Housing Strategy and we would like to offer you the following comments as you consider the draft and plan for future steps associate to the Housing Strategy.

We acknowledge that staff are seeking endorsement of the Housing Strategy and that endorsement of the Strategy will not commit the City to the use of any specific tools at this time. Rather, it will provide direction to staff to undertake the work necessary to identify the details associated with each tool, consult with the public and stakeholders, as appropriate, on those details, and seek Council's approval of the individual tools accordingly. BILD believes this is an excellent approach for such a comprehensive document.

To begin, we would like to thank staff for their extensive consultation process with the various stakeholders. BILD staff and its members participated in several meetings over the course of this review, and the preparation of this work was an iterative process.

We note that the Housing Strategy continues to support the goal of requiring 25% of all new residential units to be affordable on a city-wide basis, but further refines this target by allocating the target by certain households in the income categories being:

- Low Income – Minimum of 10% of all new residential development units
- Moderate Income – Minimum of 15% of all new residential units
- High Income – Continue to provide a diversity of housing forms to suite all households

We believe the income threshold for low income results in too deep a subsidy and the 10% for this housing target. This group should be addressed by the City's social housing policies. We acknowledge that there is much more work to be done to operationalize this goal. As an initial set of recommendations, we would like to share some lessons learned from our members in other municipalities that are contemplating affordable housing targets near or equal to these percentages:

- Generous transition and phasing of the policies must accompany the targets to allow the market to adjust appropriately.
- Based on initial feasibility analyses, achieving a 10% target of affordable housing units can render projects unviable in the absences of financial incentives and offsets. This is evidenced in a recent report BILD prepared (first attachment).
- The overall success in achieving these aspirational targets is based on the City's ability to fulfill a comprehensive partnership model for the creation of these affordable housing units.
- This means, that the financial tools referenced in the staff report, which include an update or the direction "to create programs and grants that help incent affordable housing, and where appropriate, develop revenue generating programs to fund affordable housing financial

incentive programs” become a “necessary” not “potential” component of overall success of this work.

Going forward, we welcome the opportunity to participate in additional consultation of staff's research, including the following items:

- Identifying Protected Major Transit Station Areas (PMTSA) in accordance with the York Region Official Plan.
- Enabling the use of Inclusionary Zoning that will require a portion of market housing to be affordable units over the long term.
- Enabling the use of Community Planning Permit System that combines zoning, site plan, and minor variances into one streamlined process and to impose conditions of development including the provision of affordable housing.
- Enabling gentle density in existing Neighbourhoods through additional residential units and creation of multiple units within existing building envelopes.
- Prohibiting the demolition and conversion of rental housing when vacancy rates are less than 3% to protect existing purpose built rental housing.
- Requiring larger sized units (3+ bedrooms) in multi-residential buildings with 20 units or more
- Prioritizing the use of public surplus lands for affordable housing.
- Directing for the development of complete communities by designating areas for a mix of land uses and transit-oriented development.
- Permitting more inclusive and innovative housing forms.
- Adopting a Community Improvement Plan to provide land, grants or loans to incentivize provision of affordable housing.
- Adopting a Corporate policy regarding the disposition of surplus City lands that prioritizes the sale to providers of affordable housing.

Thank you for the opportunity to submit these comments and please feel free to contact the undersigned with any questions.

Sincerely,



Danielle Chin, MCIP RPP
Director of Policy and Advocacy

Cc: Chun Chu, City of Richmond Hill
BILD York Chapter members