

2026 Financing Growth Update: Bill 16 Compliance Update to Density Bonus Provisions & Inclusionary Zoning - Oppose

Date Received	Time Created	Subject	Position	Content	Author Name	Neighborhood	Attachment
2026-06-02	14:25	2026 Financing Growth Update: Bill 16 Compliance Update to Density Bonus Provisions & Inclusionary Zoning	Oppose	<p>Dear Mayor Sim and Council,</p> <p>According to the provincial guidelines, inclusionary zoning policies are supposed to be set at a level that will not impede development. Considering that dozens of multiplexes have been proposed for lots that qualify under the SRP and TOA policies, it is very safe to say that the City's (unfunded) inclusionary zoning policies are in fact impeding development of apartments and keeping rents artificially high.</p> <p>If you ask planning staff about this they will likely tell you, as they have told me, that developers of buildings with inclusionary demands cannot charge more than market rents. This is true. Higher rents are achieved by building less to avoid IZ requirements, or not building at all, until city-wide rents rise enough to cover the losses from the inclusionary requirements. When less new housing is available, the people that would have lived in it have to move into an existing apartment instead, bidding up the cost of all existing apartments. It is really important to note here that none of the additional rent paid for existing apartments, which is most of the housing stock, will go toward below-market housing; it will instead go directly into the pockets of the landlords.</p> <p>Of course, more affordable rents are clearly not City staff's priority at all. Every policy notionally intended to create more housing supply is calibrated to be only marginally viable, or often marginally non-viable. All else equal, these projects will stop being viable as soon as rents fall; they are self-defeating. The demonstrated priority of the City is to prevent single-family lots from becoming more valuable, or, if you like, to prevent market rents from becoming more affordable.</p> <p>A lottery for a small amount of subsidized expensive new below-market housing is no replacement at all for broad affordability of the much larger existing housing stock. These policies should be expected to worsen affordability, and to increase crowding, out-migration, and homelessness.</p> <p>It is largely not necessary to address a lack of cheap housing only with new, below market homes. Several studies have found that large new apartment buildings create vacancies in cheaper existing homes. These vacancy chains increase availability of much more affordable housing in the course of months, not decades as is supposed by people who consider only depreciation of new buildings. Please see the attached chart, excerpted from "The Downmarket Impact of New Multifamily Housing..." by Fang et al.</p> <p>At the very least, the City should set an across-the-board requirement, including for multi-million dollar detached houses & major renovations of them. If it is not reasonable to expect someone who can afford to buy a very expensive home to contribute to non-market housing, why is it reasonable to expect an outsized contribution from renters and buyers of small condos? This would also eliminate the market distortion that is causing houses and plexes to be built where the market actually wants 6-storey apartments.</p> <p>Thank you for your consideration of my comments.</p> <p>Sincerely,</p> <p>Owen Brady</p>	Owen Brady	Hastings-Sunrise	Attachment 1