In its Editorial (November 9, 2023) "*Questions surrounding the Mayor's Proposal",* the Free Press is right to question the implications of the City of Winnipeg succumbing to the Liberal Federal Government's recent directive covering the Federal Housing Accelerator Fund (HAF). In order to be eligible to receive a portion of the $192 million fund, the City must "*legalize four units, and up to four storeys within 800 metres of transit, as-of-right, city-wide*"!

Neighbourhoods are the basic fabric of any city. To maintain and regulate their characteristics, modern cities including Winnipeg have adopted zoning designations such as R-1 Single family residences. Zoning is the most common regulatory urban planning method used by local governments in developed countries. Their use can be traced back to antiquity.

The Federal HAF requirements will turn 100 years of planned neigbourhood development on its head. The mandate is typical of big government "*one size fits all*" programs. Cities, including Winnipeg have diverse neigbourhoods, many of which comprise older homes with aging infrastructure. The HAF has a meaningful role in promoting affordable housing and the requirements might serve a useful purpose if imposed from inception on <u>new development areas</u>; for instance, the Parker Lands. However, requiring Winnipeg to blanket every existing neigbourhood with preapproved unrestricted multi-family four storey development is draconian and disregards the sensitive balance in which mature neighborhoods exist; and indeed, is inimical to their continued viability.

A house is normally an individual's largest financial investment. Homeowners invest in their homes deservedly expecting the applicable surrounding R-1 zoning designations will be retained. Or at a minimum, as a "matter of law" any change in the designation will be subject to the

City's administrative approval and endorsed at a public hearing where affected neighbours can contest the appropriateness of the change. The process places the onus on the applicant to establish that the proposed change meets with a variety of City Guidelines, including *Complete Communities Direction Strategy*, *Infill in Mature Communities*, *The Winnipeg Climate Change Action Plan,* as well as minimum parking requirements, proximity to services and access/ingress requirements etc. A change in zoning requirements to erect a multi-plex is transparent and open to public scrutiny.

If adopted the HAF provisions will completely erase the established practice requiring a proponent to justify the change and establish that it aligns with the mentioned policies.

The change will also be a bonanza for developers "as-of-right", to speculate in every street corner and lot that has a potential multi-family use. The unintended consequence is the creation of a new market wherein every home on a potential multi-family site is valued not for its current single-family use, but for its "tear-down" and development value. The result will be a huge disincentive for owners to reinvest in their own homes, and the erosion of vibrant mature neigbourhoods. This will occur in every single neighborhood, including those that don't see a dime of Federal HAF monies or any increase in affordable or accessible housing. Does the City truly appreciate the economic and social implications of permanently adopting the HAF requirements?

Furthermore, most mature neighbourhoods lack the required infrastructure including roadways, on-street parking, separate surface run-off and waste water lines, and community green space, to properly accommodate unrestricted multi-family development.

While the HAF requirements are laudable in requiring the subsidized units to be within 800 metres of a transit line, that's a long way to catch

a bus in February! Winnipeggers still rely heavily on automobiles for transportation. In my neighbourhood, every recent multi-family development has been approved with almost 2 cars for every new unit. Being close to a bus stop will not curtail every new development putting more cars, congestion (and Amazon deliveries!) and pollution on streets already lacking adequate parking for their residents.

Abandoning the requirement to amend R-1 zoning designations in favour of the ill-conceived HAF program will have long lasting effects on our communities. The four-plex "as of right" provisions may survive and plague neigbourhoods in perpetuity long after the Fund has been spent and the politician's take their bows. By adopting the "anything goes" notion, the City is set to betray not only its existing guidelines, years of precedent, but also its homeowning citizens. As an aside, I question the legality of enacting the proposal.

As Winnipeg celebrates its sesquicentennial, I fear we are about to turn the page back to the "*Wild West*" of helter scattered disordered development. I would encourage the EPC to tread carefully in considering such an impactful revision to the City's zoning regime, and not succumb to the Fed's *quick money* where more thoughtful solutions to infill development in our uniquely Winnipeg mature neigbourhoods are warranted.

Richard Leipsic is a lawyer, lifelong resident of Winnipeg and lives in the Crescentwood-Enderton Park Heritage Conservation District, a mature neighbourhood