

December 10, 2019

Chairman and Members,
Planning and Housing Committee
City of Toronto

Re: Item PH 11.5, Housing TO 2020-2030 Action Plan

I am here on behalf of the Advocacy Centre for Tenants Ontario (ACTO), a community legal clinic serving the needs of Ontario's low-income tenants.

We urge the Committee to adopt the recommendations in the staff report and particularly the recommendation to adopt the Housing TO 2020-2030 Action Plan as a framework to address housing and homelessness issues over the next 10 years. We are greatly encouraged to see a housing plan based on human rights and ask you to support a commitment to the right to adequate housing as the central guiding principle for Toronto's housing strategy.

While the action plan contains much that is aspirational as opposed to firm commitments, we take a great deal of comfort from the fact that the Mayor has now seen the wisdom of using the City's revenue tools to dedicate more City money to meeting housing needs. We trust that this committee and the other members of Council will give strong support to this new direction.

The City of Toronto must target its housing policies to benefit those in greatest need -- low-income and moderate-income tenant households who are financially disadvantaged in the private rental market. Almost half of tenant households in Toronto spend 30% or more of their income on shelter. The greatest need in Toronto is for more purpose-built rental housing stock that is affordable over the long-term to the wide range of residents in this precarious situation.

As the City moves forward with the implementation of a housing plan guided by a human rights framework, we want to address some further work that needs to be done to meet the goal of a progressive realization of the right to housing:

1. Permanent affordability

Some of the affordable housing developed using public investment has been limited to an affordability period of 25 years. As you have heard repeatedly, this only pushes the affordability crisis down to the next generation. In the past few years we have begun to see the results of earlier housing programs taking this short-sighted approach. ACTO

believes that there must be a commitment in the plan to ongoing affordability of all housing units built using public resources.

2. Prioritize non-profit development

The best way to achieve this permanent affordability is for the City to require that priority be given to development by non-profit housing providers (including co-operatives). These are the organizations that have a public interest in maintaining secure tenure for residents and permanent affordability.

We urge this Committee to ensure that the plan prioritizes the non-profit and co-operative housing sector. Toronto needs to collaborate with them to provide rental housing that is affordable on a long-term basis and to work with its counterparts in the provincial and federal governments to make sure deeply affordable housing is built in partnership with non-profit housing providers. The National Housing Strategy is providing this sector with new opportunities and funding. Toronto should use the tools at its disposal - such as land contributions, expedited approval processes, development charge waivers, and reduced parking requirements - to facilitate non-profit and co-operative housing development.

3. Move to an income-based definition of affordability

We are encouraged to see that the Housing Plan will look into options for an income-based definition of affordability for new affordable housing. The current definition of affordable housing - with rents at 80% or 100% of average CMHC market – leaves the greatest needs unaddressed. These rents are not affordable for most households in need, and leaves out virtually everyone on the city's social housing waiting lists.

The City must adopt a realistic, income-based definition of “affordable housing”. Many people's wages and social assistance incomes have stagnated, and the plan must ensure that the housing needs of the full range of City residents are addressed. Affordability is a key principle in the definition of “adequate housing” and must form the basis for housing initiatives aimed at assisting those in greatest need. The income-based definition of affordability should set “affordable” as a maximum of 30% of income, and develop income ranges that are representative of the different levels of need in Toronto.

We urge you to give consideration to these issues and to recommend to Council that Housing TO 2020- 2030 be adopted as a housing roadmap for the new decade.

Thank you for attention.

Kenneth Hale,
Director of Advocacy and Legal Services