



## Planning and Housing Committee

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### re: PH14.3 Housing Now Initiative – Annual Progress Report

Dear Deputy Mayor Bailao and members of the Planning & Housing Committee,

Right to Housing in Toronto (R2HTO) is a network of individuals and organizational supporters that are working to ensure that the City of Toronto takes a rights-based approach to its housing planning and policy. The work of R2HTO is guided by a Steering Committee that consists of ACORN Canada, Advocacy Centre for Tenants Ontario (ACTO), Centre for Equality Rights in Accommodation (CERA), Emily Paradis (Maytree Fellow, Housing and Homelessness Researcher), Federation of Metro Tenants' Association (FMTA), Joy Connelly (Housing Advocate), and Maytree.

R2HTO was very pleased to work closely with the City of Toronto in creating the *HousingTO 2020-2030 Action Plan* and the new *Toronto Housing Charter*, founded on the recognition of housing as a fundamental human right. With this groundbreaking plan, Toronto has committed to the progressive realization of the right to adequate housing for all residents, with priority to those in greatest need, using all available measures and resources within its jurisdiction.

R2HTO welcomes the annual progress report on the City's Housing Now initiative. By dedicating City land to the creation of affordable, accessible housing and social infrastructure in complete neighbourhoods, Toronto is taking important steps towards the progressive realization of the right to adequate housing.

Nevertheless, the recommendations in this report should be strengthened in order to truly reflect a rights-based approach to housing in keeping with international law.

Specifically, R2HTO calls on this Committee to:

1. Strengthen protection of affordability for market tenants;
2. Further strengthen provisions for accessibility and universal design; and
3. Prioritize non-market partners, including non-profits, co-ops, and land trusts, in the development of these sites.

These improvements are necessary to bring the City into compliance with its duties to prioritize the most vulnerable, and dedicate the maximum available resources to the realization of the right to adequate housing.

First, we urge this Committee to seize this precious opportunity to impose real rent control on all units built through Housing Now. This report's introduction of some limitations on rent increases represents an improvement for Housing Now. At the same time, the recommendations fall far short of protecting affordability for tenants, especially in a context where tenants' incomes are stagnant, and asking rent for new units is already far more than most tenant households can afford. Layering on 2% above the guideline increase, along with provisions to further increase rents, is bound to destabilize security of tenure for many Housing Now tenants.

Secondly, R2HTO welcomes the recommendation to exceed the Housing Now accessibility targets. We urge this committee to further strengthen this provision by increasing the required targets for accessible units, as well as requiring the implementation of universal design throughout all ownership, market rental, and affordable rental buildings, as well as all non-housing amenities, developed on Housing Now sites.

Thirdly, R2HTO is pleased to see the recommendation to maximize the participation of non-profit, co-operative, and Indigenous housing providers in future offerings. We urge this Committee to go further, and prioritize non-market partnerships for all future Housing Now sites. This would be in keeping with the City's duty to use the maximum of its available resources for the progressive realization of adequate housing. In return for the City's considerable investment of its land, Open Door incentives, and foregone revenue, non-market providers deliver the most years of affordability, the deepest affordability, and the best housing conditions for residents.

Fundamentally, a rights-based approach is about transforming how we view housing, from a commodity to a basic human right. The potential of Housing Now to address Toronto's housing crisis is severely limited by the initiative's reliance on private market partnerships. Rent increases above the cost of living, vacancy decontrol, and limited accessibility are not necessary to make these projects feasible – they are only necessary to make them profitable. Instead of structuring this program to deliver an acceptable profit margin to private investors, the City should structure it to deliver affordable, accessible housing to those who need it most.