



**MORE NEIGHBOURS  
TORONTO**

Dear Members of City Council,

**RE: PH.31.13 - Modular Supportive Housing Development at 175 Cummer Avenue**

***About More Neighbours Toronto***

[More Neighbours Toronto](#) is a volunteer-only organization of housing advocates that believe in building more multi-family homes of all kinds for those who dream of building their lives in Toronto. We advocate for reforms to increase our city's ability to build more homes in every neighbourhood. We are a big-tent organization with members across the political spectrum who are committed to counterbalancing the anti-housing agenda that has dominated Toronto's politics, created an affordability crisis, has cost burdened a new generation of aspiring residents. We are firmly committed to the principle that housing is a human right and believe Toronto should be inclusive and welcoming to all.

***Position***

We supported your earlier 2021 request for a Ministerial Zoning Order (MZO) in order to accelerate the delivery of this project. More Neighbours Toronto supports the efforts to get desperately needed supportive housing built at 175 Cummer Avenue.

Over 8,000 people, citizens of the City, and members of our community are currently experiencing homelessness in Toronto.

Unfortunately, a loud minority of NIMBY voices appear to have successfully convinced the provincial government to not issue the Ministerial Zoning Order (MZO) needed to rapidly build this modular housing project, claiming that there has not been enough consultation, or that this is not a "good location" for modular housing. The fact is that these are the voices of a very vocal NIMBY minority. There will never be enough consultation and no location in their neighbourhood will be a "good location" for them. In reality, there has been ongoing consultation for an entire year and there are only fabricated reasons why this location is not appropriate.

Our City's current planning process gives standing and a voice to our society's worst exclusionary instincts. It incentivizes excluding new neighbours and especially our society's most vulnerable from our neighbourhoods. It speaks volumes that a MZO was required in order

to quickly build modular housing, as opposed to a "potentially much lengthier City rezoning process", as Councillors Bailao and Filion [wrote to committee](#).

It has been suggested that third-party appeals would be the reason why the City rezoning process would be much lengthier. Third-party appeals would not be a concern if this kind of housing was permitted everywhere under the changes coming to Toronto's official plan review.

We need the City to proceed immediately with the rezoning process to get this modular-housing completed as fast as possible. However, we also urge Council to ask the deeper questions:

- If affordable and supportive housing is a top City priority, why is the current City process for building it so much slower than asking the provincial government for a MZO?
- What structural changes do we need to make to the City planning process and regulations to allow projects like this to be built more quickly and "as of right" in our neighbourhoods?

Part of the answer to these questions can be found in the [report from the Housing Affordability Task Force](#), including preventing right of appeal for projects with at least 30% affordable housing for 40 years and requiring higher fees for third-party appeals. This example on Cummer of how a handful of people can block housing for those who need it most by threatening to appeal is exactly why our City Council needs to support the proposed reforms from the Task Force Report.

Sincerely,

Jacob Dawang  
More Neighbours Toronto