



Centre for Equality Rights in Accommodation
Centre pour les droits à l'égalité au logement

July 5th, 2022

Deputy Mayor Ana Bailão
Chair of the Planning and Housing Committee
Toronto City Hall
100 Queen Street West
Toronto, ON M5H 2N2

Dear Members of the Planning and Housing Committee,

Re: PH35.14 Our Plan Toronto: Land Needs Assessment

I am writing on behalf of the Centre for Equality Rights in Accommodation (CERA) to contribute our views on how Toronto should grow based on the recently published Land Needs Assessment (LNA). CERA is Canada's leading non-profit organization working to advance the right to adequate housing by providing free services to renters facing evictions and human rights violations to remain housed, by providing education and training about housing rights across Canada, and by advancing rights-based housing policy through research and policy advocacy.

The LNA provides useful perspective on how the potential housing stock will meet the needs of our communities over the long term. The numerous scenarios explored using various data sources went above and beyond provincially mandated requirements. Indeed, the diversity of sources used to inform the assessment is a positive reflection of the City's efforts to enhance its capacity to make evidence-based decisions.

The broad findings of the LNA are striking. They indicate a potential excess of housing supply in the future even as we face a housing crisis today. This is an important point to consider when forging responses to urgent situations that do not create problems in the future, a sentiment that the report also acknowledges by highlighting the need to think strategically on matters pertaining to housing affordability and inclusion among other things. We appreciate that such implications were raised as part of an exercise that is otherwise only expected to set a baseline for future planning.

CERA proposes that a rights-based approach to housing will offer a way out of the current housing crisis, while ensuring that the stock of housing over time remain occupied and viable. In part, this means setting goals and embedding principles and standards that promote the housing needs of everyone, particularly those in the greatest housing need. The Official Plan's commitment to inclusion and eliminating disparities is therefore on the right track.

By extension, planning exercises should reflect the needs of our communities more appropriately. For example, the range of housing options is an important consideration. Notwithstanding the potential for a general oversupply of housing in the long term, the LNA applied the findings of a related study on "Right-Sizing and Generational Turnover" to conclude that there may not be enough "ground-related" units and purpose-built rental buildings that meet the diverse housing needs of Torontonians. Initiatives

such as “Expanding Housing Options in Neighbourhoods” are promising but must be complemented with a broader set of initiatives that leverage zoning to promote purpose-built rentals.

Housing options must also be affordable for everyone in the city, an issue that the LNA acknowledged is beyond the scope of its report. Still, given that the current report went above and beyond its mandated requirements to explore various growth scenarios, there is likely room to continuously monitor housing against other metrics including income and geographical distribution. This work could be a complementary exercise and help refine newly introduced policies to create affordable housing options, such as inclusionary zoning. Indeed, this type of analysis could provide richer information on the impacts of demolition of housing stock and inform ways to strengthen Official Plan provisions around replacement of rental units.

Planning exercises should also continue to build on past engagement efforts to form a more nuanced picture of our communities’ varied needs, capabilities and potential to make the city more inclusive and advance the right to adequate housing for all. For example, continued and deeper engagements can shed more light on specific motivations that are driving up demand for certain types of housing and changes in neighbourhood dynamics. This, in turn, could help with a range of initiatives such as refining area plans and providing more culturally appropriate housing options.

These exercises should also be complemented with routine efforts to update data sources for more robust analysis. For example, insights based on 2021 Census data would be welcome. We also encourage the City to include other organizations with expertise in data analysis to participate early in the process, leaving more room for the broader public to meaningfully reflect and comment on such significant pieces of work.

Our proposed considerations can complement the City’s efforts to document Toronto’s socio-economic and demographic changes more flexibly, and plan effectively for the city’s growth and the housing needs of its residents. We hope that these rights-based recommendations help the City to manage its population growth according to its stated goals of promoting inclusivity and eliminating disparities.

We look forward to providing more of our housing expertise and welcome further discussion with the City to ensure its housing initiatives are effective and rights-based.

Sincerely,



Bahar Shadpour

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