



**MORE NEIGHBOURS
TORONTO**

Dear Members of City Council,

RE: CC.2.1 - 2023 Housing Action Plan

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, and 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.

Summary of Position

More Neighbours Toronto welcomes and supports the proposed "2023 Housing Action Plan" proposed by Mayor Tory. In addition to the long overdue step of legalizing and regulating multi-tenant homes, this action plan will start work on proposals to challenge the exclusionary planning policies that have dominated council for the past decades. This is a pivotal term of Council for housing. We urge you to vote in favour of the 2023 Housing Action Plan and begin this term of council by setting a positive example for other municipalities in the region to follow.

Necessity of Exceeding the Provincial Housing Target

In Toronto, there are simply not enough homes for the people who want to live here. This is not a point of debate: there is consensus on Ontario's need to build at least 1.5 million homes over the next decade from the CMHC, Mike Moffat of the Smart Prosperity Institute, and every single provincial party in the legislature. As Ontario's largest city and economic engine, Toronto must lead. Thus, committing to meeting or exceeding the provincial target of building 285,000 homes by 2031 is a prerequisite to ending the housing crisis in Toronto: necessary but not sufficient. We recommend that the City plan to exceed the target with some margin for error, as we will not know the exact effect of policy changes until they are undertaken.

The Beginning of the End of Exclusionary Zoning

The vast majority (66%) of residential land in Toronto is zoned for single-family homes, the most expensive and least environmentally-friendly housing type. In other words, apartments are banned in most of the city. The population of these neighbourhoods has decreased over the past fifty years, even though Toronto's population has grown as a whole. Young people today cannot afford to stay in the neighbourhoods they grew up in. Consequently, parents are unable to live near their adult children (and

grandchildren). Seniors are unable to downsize within their neighbourhoods. Immigrants must live in poor conditions far away from work or school to make ends meet. We can provide more housing options for people to live in if we permit more types of homes beyond just single-family detached houses. This starts with ending exclusionary zoning to legalize homes that people can afford.

We know that there will be calls from established interests for a "no or go slow" approach when it comes to zoning changes because zoning has remained static in so many places for so many years. This is the wrong approach for this moment. Much of the groundwork already exists and has undergone public consultation. Missing middle and changes to neighbourhood land use have been studied and supported by [local academic institutions](#), [the Toronto Region Board of Trade](#) and, of course, by Toronto City Planning as part of its [Expanding Housing Options in Neighbourhoods](#) program and ongoing Municipal Comprehensive Review. The survey on multiplexes, for example, found [77% of responses supported multiplexes](#), with broad support across different areas of the city, age groups and incomes. Nevertheless, Council opted to send this item for yet more consultation in one specific ward, which happens to have some of the most expensive houses in the city as well as all of Canada. Public input matters but, when it does not achieve perfect consensus even amongst the selected groups who are prioritized in consultation, too often **the attitude seems to be that more consultation is a reasonable and neutral answer without consequences**. The [stories of students ending up in shelters or being exploited by landlords in unsafe, illegal living situations](#) demonstrate how absolutely false this idea is. We are losing people in Toronto due to a few fears and uncertainties that will never be satisfied by any amount of consultation and this should be accounted for when designing the plan and timelines.

The housing crisis calls for serious action now. **We cannot tie up plans in years-long processes, reports and consultations, when we already know what we need to do.**

At the same time, we cannot let proposals for ending exclusionary zoning be watered down to the point where denser forms of housing are only permitted in name. The economic feasibility of building homes must be top of mind in every review and every proposed change. We welcome the reviews of urban design guidelines, heritage standards and urban forestry policies to this end and hope that they will deeply challenge the orthodoxies of city planning.

Legalization of Multi-tenant Homes

Legalizing multi-tenant homes is a step towards housing justice in the city. If properly regulated, rooming houses are an option for low-income residents, newcomers, students, and social assistance recipients. The city's reluctance to legalize rooming houses has not eliminated rooming houses, but instead allowed illegal rooming houses to function outside the bounds of regulation. This has created a scenario where residents are vulnerable to eviction, exploitation, and risks to their physical safety.

We often hear refrains that rooming houses are only appropriate in certain neighbourhoods. The reality, however, shows that there is a need to fill, and without multi-tenant housing residents will resort to ever more precarious housing - illegal rooming houses, shelters, or being entirely unhoused. This is especially true given the increasing lack of affordability and lack of investment in affordable and emergency housing options in the city. The best time to legalize and regulate multi-tenant homes was yesterday, but today is the next best.

Regards,

Jacob Dawang
More Neighbours Toronto