

**From:** [info@right2housingto.ca](mailto:info@right2housingto.ca)  
**To:** [councilmeeting](#)  
**Subject:** Re: R2HTO Submission on CC2.1 : 2023 Housing Action Plan  
**Date:** December 13, 2022 4:41:16 PM  
**Attachments:** [R2HTO Submission to City Council Item CC2.1 Housing Action Plan 2023.pdf](#)

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Hello again,  
My sincere apologies, the earlier pdf attachment did not have the footnotes. Here is the submission attached once again.  
Really sorry for the inconvenience.

Best,  
Ambalika

Quoting [info@right2housingto.ca](mailto:info@right2housingto.ca):

> Good Afternoon,  
>  
> I would like to make a submission on behalf of the Right to Housing  
> Toronto on the agenda item being considered by the City Council on  
> December 14, 2022 – CC2.1: 2023 Housing Action Plan.  
>  
> Please find attached our written submission and let me know if you  
> have any questions.  
>  
> Best,  
> Ambalika Roy  
> Coordinator, R2HTO  
> <https://right2housingto.ca/>  
>  
> ----- End forwarded message -----

# CC2.1: 2023 Housing Action Plan

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Submission to Toronto City Council

December 13, 2022

Submission by: Right to Housing Toronto



Toronto City Council

City of Toronto

100 Queen Street West

Toronto, ON M5H2N2

Dear members of Toronto City Council:

**Re: CC2.1: 2023 Housing Action Plan**

We are representatives of the Right to Housing Toronto (R2HTO), a network of organizations and individuals working to support the implementation of the right to housing by the City of Toronto.

Right to Housing Toronto is delighted to see Mayor Tory's call to ramp up Toronto's efforts to create a more affordable city. The recommendations before you reflect the urgency of Toronto's housing crisis and the need to rally every tool at the City's disposal to address it.

As you know, Right to Housing Toronto is committed to supporting City Council and City staff as you fulfill your Toronto Housing Charter obligations to ensure "*all* residents have a right to a safe, secure and affordable home." When we consider any bold initiative, as this one is, we ask, "Does it promote affordability? Habitability? Security of tenure? Accessibility?"

Based on this analysis of the proposed 2023 Housing Action Plan, we offer City Council three words of advice.

**First, in the rush to create new homes, take care to protect the affordable housing we already have.**

The recommended 2023 Housing Action Plan proposes an “all-in” approach to creating new affordable housing. It is important to note, however, that new condominium apartments and even new purpose-built rental apartments are unaffordable to the *majority* of households now living in Toronto. For example:

- As of October 2022, the average purchase price of a new condo unit was \$749,375.[1] To become affordable to Toronto households with the *median* after-tax household income of \$74,000, these units would have to “trickle down” to between \$350,000 - \$400,000 per unit – something that simply will not happen.
- The average rents of units now on the market range from an average \$1,904 for a bachelor apartment to \$4,170 for a three-bedroom unit.[2] At these rates, the 40% of Toronto households who earn less than \$60,000 per year cannot afford even a bachelor unit, and the 80% of households earning less than \$125,000 a year could not afford a three-bedroom unit.

In contrast, the average rents among the 71,000 Toronto apartments built before 1960 range from \$1,143 for a bachelor apartment to \$2,019 for 3+ bedrooms. These are not the deeply affordable rents that the non-profit and co-op sector offers. But they *are* affordable to Toronto’s essential workers earning \$30 - \$60,000 per year.[3]

To ensure Toronto’s most affordable homes are not demolished to make way for new, more costly homes, Toronto must ensure every affordable unit lost is replaced at the same affordable rent, and every displaced tenant is supported as they find interim accommodation until the new building is completed. **We know what works.** Thanks to Toronto’s rental replacement policies, City Council secured the replacement of 907 affordable and mid-range units in the first seven months of 2022, while approving an additional 10,345 new market units to go forward.[4]

Unfortunately, this policy is under threat from the Ontario Government's Bill 23. *We therefore ask City Council to direct staff to explore all possible avenues to safeguard Toronto's affordable rental housing, including funds to acquire buildings at risk, and report back in March 2023.*

**Second, use the next two years to refine the City's approach to regulate Multi-Tenant Houses.**

We are VERY happy to see Mayor Tory's call to legalize Multi-Tenant Houses (MTHs) across the city. MTHs have always been an essential part of Toronto's affordable housing stock, relied upon by newcomers, students, seniors and other low-income singles. By eliminating the discriminatory restrictions that have kept inner suburban rooming houses in the closet, tenants are now able to act on their behalf to ensure their homes are safe, healthy and affordable.

Right to Housing Toronto looks forward to working with City staff over the next two years to promote safer, cleaner and more secure homes. *We also hope that City staff will work closely with both rooming house tenants and landlords to ensure a smooth transition to compliance without displacing tenants.*

**Finally, make the most of this opportunity to create accessible homes.**

Toronto's senior population is expected to double by 2041. Many people with disabilities are already living in institutions simply because they can't find an accessible home. The hundreds of new buildings anticipated in Mayor Tory's plan create a once-in-a-generation opportunity to incorporate Universal Design principles into every new building. *Let's not waste this opportunity.*

**The opportunity to do it right.**

Right to Housing Toronto is excited by the ambition of the 2023 Housing Action Plan, and looks forward to working with City Council, committees and staff as the plan unfolds. We also look forward to the establishment and hiring of a Housing

Commissioner to offer sustained guidance to ensure this plan, and the City's other housing initiatives, are truly plans for *all*.

Thank you,

On behalf of the Right to Housing Toronto

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[1] Toronto Regional Real Estate Board, Condo Market Report, 2022 Q3,  
[https://trreb.ca/files/market-stats/condo-reports/condo\\_report\\_Q3-2022.pdf](https://trreb.ca/files/market-stats/condo-reports/condo_report_Q3-2022.pdf)

[2] Rentals.ca, National Rent Report, October 2022, Average Listed Rent by City and Unit for Condo and Apartment Listings, <https://rentals.ca/national-rent-report>

[3] Statistics Canada, 2021 Census Population, Toronto, City.  
<https://www12.statcan.gc.ca/census-recensement/2021/as-sa/fogs-spg/page.cfm?topic=5&lang=E&dguid=2021A00053520005>

[4] Melissa Goldstein, Submission on Municipal Rental Replacement By-laws and Ontario Bill 23, November 24, 2022.

