

CC2.1: 2023 Housing Action Plan

Submission to Toronto City Council

December 14, 2022

Toronto City Council
100 Queen Street West
Toronto, ON M5H 2N2

Dear Mayor Tory and Members of Council,

Re: CC2.1: 2023 Housing Action Plan

I am writing on behalf of the Canadian Centre for Housing Rights (CCHR) to voice our support for the proposed measures in the City of Toronto's 2023 Housing Action Plan. For 35 years, we have worked tirelessly at the intersection of human rights and housing, providing free services to renters facing evictions and human rights violations to remain housed, providing education and training about housing rights across Canada, and advancing rights-based housing policy through research, policy development, and litigation.

The Housing Action Plan

To start with, we commend the overall direction made to the City Manager to find ways to produce a range of new housing including market, non-market, and hybrid options. This signals a necessary move away from current development trends consisting of condominiums and detached homes that do not meet the diverse housing needs of Toronto's residents. The recommended levers to enable this shift are also promising insofar as they can likely make a measurable and positive impact in people's lives.

For example, we support recommendations to optimize density through making better use of existing lands, Official Plan and Zoning By-law amendments. These are productive moves that refine and build on existing initiatives such as "Expanding Housing Opportunities in Neighbourhoods (EHON)," and are in line with [past recommendations](#) that we have made. These proposals rightly recognize the untapped potential of lands in well-resourced areas that could comfortably accommodate a larger and more diverse cross-section of Toronto's growing population.

Moving forward, we encourage the City to explore how more permissive Zoning can be used to facilitate the creation of affordable housing options beyond existing City programs such as Housing Now and Open Doors. We are hopeful that the City will consider such matters given its recommendation to ensure intensification supports inclusion and other key criteria that are in many ways in line with a rights-based approach to housing.

There is also room to strengthen existing housing programs as well, which is why we are pleased to see recommendations to revisit such initiatives. For example, Open Doors can better prioritize non-profit housing providers to develop affordable housing by making enhancements to the program's application process. More technical support can also be offered to help plug staffing shortages that hinder such organizations' ability to carry out administrative work efficiently.

In addition, we support directions made to the City Manager to create a post-secondary housing strategy to increase student housing options. This is an overlooked area that can better involve students and educational institutions in building our communities in more inclusive ways. Our engagement with student organizations has also revealed the challenges they face with accessing housing that is affordable to them. Better incorporating the student population into Toronto ensures that they will remain in the city for the long term and contribute to its dynamism.

Preserving Affordable Housing

The series of recommendations that effectively legalize multi-tenant houses across the City of Toronto are a significant complement to the Housing Action Plan. This rare stock of deeply affordable housing for some of Toronto's lower income households have been left in a state of limbo in many parts of the city. To finally bring these homes into a regulatory framework with provisions to enforce quality standards is a critical step in effectively ensuring housing stability and safety for many residents that were otherwise living in chronically precarious conditions with little recourse to remedy their problems.

We encourage the City to build on such initiatives to preserve its existing housing stock, for example, by enhancing the Multi-Unit Residential Acquisition (MURA) program. The program would function as a critical check to larger, well-financed actors who prefer purchasing existing buildings and increasing rents to generate quicker and higher returns instead of creating new housing, a practice that is at odds with the Housing Action Plan. In addition, there is room to continue to strengthen RentSafeTO and support tenants with building their communities and engaging them in the processes related to the maintenance and retrofitting of their homes.

Way Forward

Finally, we recognize that the Housing Action Plan is introduced at a time when recent provincial legislation has placed the City in a potentially tenuous situation in terms of its fiscal position as well as its ability to effectively implement policies such as inclusionary zoning and rental replacement. We also note the expedited development approvals process passed through Bill 109 will add more capacity pressures on the City to deliver effectively.

To navigate such challenges, we encourage the City to adhere to a rights-based approach, principles of which were adopted in its HousingTO 2020-2030 Action Plan. This means continuing to ensure all available resources and tools are utilized to provide housing that meets the needs of all Torontonians as well as protecting those who are at risk of displacement. Current constraints also present opportunities to forge new relationships with the broader community to innovate on our housing challenges. In addition, we encourage the City to move forward with creating an accountability mechanism akin to a Housing Commissioner which we believe would be a viable way to advance the right to housing; this mechanism can also complement the proposed accountability measures to track the Action Plan's goals.

Thank you for your consideration. We welcome the opportunity to provide our housing expertise and look forward to further discussions with the City to ensure Torontonians can live in safe, adequate and affordable homes.

Sincerely,



Bahar Shadpour
Director of Policy and Communications
Canadian Centre for Housing Rights (CCHR)