

From: [REDACTED]
To: [Executive Committee](#)
Subject: [External Sender] Please accept the following written communication for the upcoming Executive Committee meeting scheduled for Tuesday, March 21, 2023
Date: Sunday, March 19, 2023 7:37:47 PM

Good day,

I would like to submit the written comments below as a communication for inclusion to the upcoming coming Executive Committee meeting scheduled for Tuesday, March 21, 2023. The written comments below speak to item EX3.1 - Housing Action Plan 2022-2026- Priorities and Work Plan. The communication is as follows:

March 20, 2023

Good day Deputy Mayor, Councillors, and City Staff,

RE: EX3.1 - Housing Action Plan 2022-2026- Priorities and Work Plan

My name is Paul Nedoszytko and I reside in SSW and have been an active member of the Cliffcrest Community for almost 40 years.

I would like to speak to a component of the HAP work plan which is specifically related to “removing policy and zoning barriers to building housing”.

I think it is reasonable to state that Toronto’s two tiered (market rate vs. deeply affordable), unprecedented housing affordability crisis continues to spiral out of control. Unfortunately, the Planning Department has been tasked to solve an “UNSOLVABLE RIDDLE”, for reasons previously stated in Attachment 2 - Perspective on the Rental Housing Roundtable.

There are simply too many competing and conflicting stakeholder interests at play, and without significant funding from all levels of government, efforts to build additional safe, dignified, and respectful dwelling units with supportive services for those in need, will remain a pipe dream.

Unfortunately, no viable options are available which will compel the private building sector to deviate from its primary operating model which is to achieve the highest rates of returns on investment possible. The private building sector can not be relied upon as a partner to help address Toronto’s unprecedented and unsustainable housing affordability crisis’s in any meaningful and substantive way.

Private market rate housing, whether for rental or for ownership is also driven by the same operating model noted above and it is for such reasons that all housing tenures will continue to remain in a state of affordability crisis. The affordability crisis is precluding hundreds of thousands of people from attaining secure, stable, and sustainable housing tenure in Toronto. It should therefore, be no surprise to anyone, that Toronto’s unprecedented housing affordability crisis is the primary driving force which is displacing tens of thousands of people of all income levels, from the City of Toronto.

The recent Stat Can data published in the January 2023 issue of “Better Dwelling” unravels the often confusing numbers and terminology related to immigration, net interprovincial migration, net intraprovincial migration, and emigration. Most importantly, the article distinguishes the difference between Toronto CMA (Census metropolitan areas) and Toronto proper, to which proposed zoning amendments will apply. The article is very telling. In other words, housing supply targets mandated by the Province which are specific to Toronto, are likely somewhat skewed and inflated as not all variables have been taken into account, not to mention that all variables are in a constant state of flux and therefore subject to significant changes as time passes.

<https://betterdwelling.com/toronto-residents-are-leaving-at-a-record-pace-immigration-takes-over-growth/>

To the best of my knowledge and in addition to the primary dwelling unit on a lot, zoning bylaws have been recently amended and for the most part, frameworks have been established, to permit, regulate, and facilitate the construction of the following housing types, citywide.:

- #1 secondary suites including within new builds
- #2 laneway and garden suites
- #3 rooming houses
- (zoning amendments for garage conversions and multiplex housing initiatives currently remain in the cue)

In addition, a vacant home tax was also recently implemented by the City of Toronto to incentivize homeowners to put their dwelling units back into the market place, in efforts to increase rental and home ownership inventories.

It is noted that Provincial initiatives are mandating Toronto to amend zoning to permit a total of 3 dwelling units per lot and that efforts are underway to increase the number of dwelling units per lot to 4, through a “home grown Toronto initiative” referred to as MULTIPLEX HOUSING. The multiplex housing initiative will permit up to 4 dwelling units per lot and will be permitted to attain building heights of FOUR STOREYS plus, in all areas currently zoned “Neighbourhoods”.

I will suggest housing initiatives #1, #2, and #3 noted above are reasonable and practical measures to implement and that all 3 of these housing initiatives fall into the realm of “Affordable Housing Initiatives”. These 3 initiatives will be deliverable for occupancy in a relatively short period of time. They are also closely aligned with guiding principles and the desired outcomes, of Toronto’s Housing Charter.

In other words, the 3 housing initiatives alone, will help to ensure stable and sustainable communities. They will afford neighbourhoods a range of price point and housing tenure. They will also greatly assist in maintaining reasonable and acceptable scale to built forms but more importantly, they will prevent existing vital and fragile local infrastructures from being further eroded and overwhelmed.

Housing initiatives #1, #2, and #3 noted above, will make it possible for existing homeowners and reputable and credible small scale local builders, to play a vital role

in making our City a more affordable and sustainable place to live. Affordable housing initiatives are vital in efforts to meet the diverse socio-economic housing needs and demands of existing neighbourhoods. They are also vital to meet the ever increasing demands for affordable workforce housing. Affordable housing initiatives are paramount to building and maintaining well balanced, mixed income communities vs. the higher market rates which result from investor driven, large scale condo developments.

I will also suggest the 3 housing initiatives identified above, which are a collaborative effort between the Province and the City of Toronto are more than adequate to satisfy the Province's mandate to gently increase housing density and to increase the inventory of rental and home ownership supply, for the City of Toronto.

It should further be noted that I recently spoke with Melanie Melnyk, Project Manager, City Planning Initiatives, Policy & Analysis and that Melanie confirmed that the proposed "Multiplex Housing Initiative" is NOT in any way considered to be, an affordable housing initiative.

Melanie's response then leads to the most relevant and important question which must be asked, "who will benefit the most from increasing housing supply through a home grown Toronto initiative to permit THREE and FOUR STOREY Multiplex Housing on local residential streets? Will it be the investors, equity firms, and developers who commodify housing as instruments to generate excessive wealth or will it be those who are truly in need of housing?"

It is imperative to note that mid to large scale builders and developers in the private sector are purely driven by the highest rates of returns on investment possible. Recent and unprecedented interest rate hikes combined with unprecedented building costs, not to mention the cost of property acquisition and demolition costs, will only serve to drive market rental and ownership prices of 3 and 4 storey multiplex builds through the roof, and will do very little to add housing density and viable housing options in a responsible manner. Let's also not forget and discount the prolonged and often untenable disruptions to neighbourhoods and existing residents from residential infill builds, particularly those which are unacceptable and imposing overbuilds.

It will not be for multiple years, until a measurable and meaningful determination of housing initiatives #1, #2, and #3 noted above, can be made to determine the real impacts on housing density, housing tenure, and housing affordability in areas currently zoned "Neighbourhoods"

In other words, our neighbourhoods are currently zoned to serve as new testing grounds for new, and in some cases, controversial housing initiatives.

With the above said, I think it would be extremely prudent to first evaluate all the impacts on neighbourhoods, as it relates to density, tenure, and affordability, before proceeding with a 3 and 4 storey multiplex housing initiative which is in no way considered to be an affordable housing initiative.

Safe, dignified, respectful, and sustainable affordable housing is a human right, and the City of Toronto can no longer be afforded the luxury of allowing housing to be exploited as instruments to generate excessive wealth. If Toronto wants to get back on track to being a safe, vibrant, thriving, and inclusive City for all, then policies and future zoning amendments must

align to best support what we want our City to be.

Let's build an all inclusive City. Let's build a City we can all be proud of and most importantly, a City we can all call HOME!

Thank you all, for your time,

Paul Nedoszytko