

DEPUTATION



To: Executive Committee.
Date: Tuesday, October 31, 2023.
Re: EX9.3 - Generational Transformation of Toronto's Housing System to Urgently Build More Affordable Homes.

Dear City of Toronto Executive Committee,

The Toronto Alliance to End Homelessness (TAEH) is a community-based collective impact initiative committed to ending homelessness in Toronto. Our network includes not-for-profit organisations that support those living with homelessness and those who are housed and who must spend a disproportionate amount of income on housing, as well as affordable and supportive housing developers, property managers, and landlords.

As part of our mission, TAEH works directly with the City of Toronto towards our shared goal of making homelessness rare, brief, and non-recurring. We support the efforts to address homelessness, and to maintain and grow supportive and deeply affordable housing stock in the city. This includes acting as the non-Indigenous Community Advisory Board on housing and homelessness, co-chairing the Coordinated Access sub-committee with SSHA, and co-leading the Toronto Housing and Homelessness Service Planning Forum with both the City of Toronto Shelter, Supports and Housing Administration and the Housing Secretariat.

We are writing today to provide the following input, support, and recommendations to the Generational Transformation of Toronto's Housing System to Urgently Build More Affordable Homes:

TAEH supports the City:

1. Developing new models to deliver new supportive and deeply affordable housing more quickly.

2. Preferencing co-development with the non-profit development sector over the for-profit sector.
3. Creating a non-profit land bank database to assist it in implementing its supportive and deeply affordable housing goals.
4. Implementing the initiative to create a sustainable Toronto Housing Affordability Fund.
5. Creating a quarterly reporting tool and monthly dashboard that collates all relevant data regarding the status/progress towards achieving the goals of the HousingTO 2020-2030 Action Plan, the Housing Action Plan 2022-2026, and the EX7.2 (August 24, 2023) Recommendation.
6. Developing a plan to find ways to shorten the time between initial approval and construction through increased flexibility in decision-making and the streamlining, simplifying, and rationalising of the planning approval process.
7. Finding new ways in which private funding for such projects in the non-profit sector can be encouraged.

TAEH offers additional support for the City to:

8. Engage in advocacy efforts for the Housing Action Plans with the Federal and Provincial governments as set out in the Report for Action.
9. Advocate to the Province of Ontario for additional funding, particularly to make up for the revenue the City has lost because of the *More Homes Built Faster. 2022 Act*.
10. Advocate for an increase in the amount of funding for the COHB (Canada Ontario Housing Benefit) by the federal and provincial governments.
11. Support the City's efforts to have the federal government accept its responsibility for funding housing and shelter for Convention refugee claimants.
12. Campaign for a new deal for the implementation of the City's Housing Action Plans.
13. Undertake advocacy campaigns focused on the need for a new supportive and deeply affordable housing funding model.
14. Lobby the federal and provincial governments to enhance investments in Toronto's housing sector, targeted to meet the particular needs of Toronto's population on an equitable, as opposed to an equal, per capita, basis.

TAEH recommends that the City:

15. Publish a reporting tool that collates all relevant data regarding the status/progress towards achieving the goals on a quarterly basis, and that the City further create a monthly dashboard containing all relevant updated information.
16. Ensure that both City and non-profit projects are included in any future reporting tool and/or dashboard to ensure the utility of such a tool and/or dashboard.

17. Establish a regular and efficient way to measure and monitor the type and number of private residential units created annually, to accurately measure progress in achieving overall rental housing growth numbers and affordable rental housing unit numbers.
18. Begin collecting data about rent on a per unit basis, to determine the progress in achieving overall rental housing growth numbers and affordable rental housing unit numbers.
19. Prioritise obtaining funding for construction of approved supportive and deeply affordable housing developments over the next 2 years to ensure that high-rise housing developments are completed by 2030, within the timeframe of the Housing Action Plans.
20. Significantly increase the budget for the MURA (Multi Unit Residential Acquisition) programme so that it can be accessed on a rolling basis as the need arises.

Analysis.

Financial and Implementation Considerations.

We support the “public builder model” and recommend that it be deployed to augment, increase and complement the capacity of non-profit developers, with the City performing as much of the development management as is necessary.

TAEH supports the City preferencing co-developments with the non-profit sector: we are concerned if the City chooses to work “in partnership with ... private sector development partners” it would decrease the effectiveness of the non-profit sector, diminishing its potential for capacity building, and leaving it limited to small and mid-sized co-developments.

TAEH also supports the creation of a non-profit land bank database for use by the City and recommends that the City ensure that all its partners, in creating such a database, agree on a shared set of parameters to be collected, so that an internally consistent database can be quickly assembled from the constituent materials, and does not require additional time and labour to make it so. Furthermore, TAEH supports the City, or its partners in assembling this database, to go outside their own organisations to similarly situated organisations to ensure that the finished database is as comprehensive as possible.

We are supportive of the City’s initiative to work with other private funding sources, such as United Way and the Atkinson Foundation, as well as non-governmental business, on “collaborative activities” with the goal of creating “community service infrastructure” and “a sustainable ‘Toronto Housing Affordability Fund’ as well as loan guarantees to support non-profit and public-led housing developments.”

TAEH supports the creation of a reporting tool, (and also recommends the creation of a dashboard), that collates all relevant data regarding the status/progress towards achieving the goals of the HousingTO 2020-2030 Action Plan (the “HousingTO Plan”), the Housing Action Plan 2022-2026 (the “Housing Action Plan”), and the EX7.2 Annex, (collectively: the “Housing Action Plans”). However, we believe the Housing Action Plans are too important to only be reviewed and evaluated annually. TAEH recommends that such a report be generated quarterly, with the dashboard updated every month.

TAEH recommends that both City and non-profit projects be included in any future dashboard to ensure the utility of such a dashboard. In support of this position, TAEH notes that the Report for Action references the construction by the end of 2023 of “almost 19,000 net new affordable rental, RGI (Rent Geared to Income) and rent-controlled market homes on land owned by the City and the non-profit sector (Attachment 2),” but Attachment 2 only shows 16,124 to 17,124 new homes on City land. The balance would be made by the “nearly 2,000” units in non-profit run projects that the Report for Action references. TAEH is eager to continue our collaborative relationship with the City to ensure full and precise data to make accurate projections and assessments as to whether or not targets are being met.

Intergovernmental Considerations

We offer our support to the City in its advocacy for the Housing Action Plans with the federal and provincial governments as set out in the Report for Action. We particularly offer support in the City asking the two levels of government to create landbanks in Toronto that would be exclusively available for City and non-profit development projects, and that this land be transferred at no cost to the developer as a project contribution.

TAEH also offers to support the City in its advocacy with the provincial government for additional funding, particularly to make up for the revenue the City has lost because of the *More Homes Built Faster, 2022 Act* coming into force. We also recommend innovative proposals to address the resource gap, for example setting up a provincial agency, like the LCBO, to purchase construction materials in bulk, for sale at cost, and thus lower the cost of construction for all housing developments in Toronto and across the province.

TAEH is eager to support the City seeking additional funding to expand the availability of the critical COHB programme from both levels of government.

We also offer our support to the City in its campaign to get the federal government to live up to its obligation to provide funding for the housing and shelter for Convention refugee claimants. It is critical that all asylum seekers who come to Canada are met with the resources needed to find safety, and it is a constitutionally federal responsibility to ensure that happens. We will support both the City and the provincial government in pressing the

federal government to provide adequate housing support for refugees and asylum seekers in Toronto.

We also offer to support the City in seeking an alternative source of funding to replace the development charges levied before the *More Homes Built Faster, 2022* Act came into force, and thus help the City help the province in achieving its own housing policy goals. In that light, we are encouraged by the recent discussions between the City and the province to address these issues, and the positive response to date from the provincial government.

Time is Running Out to Achieve the Housing Action Plans.

TAEH is concerned that the City is running out of time to achieve the goals it has set for itself in the Housing Action Plans. We are gratified that this concern is shared by the City. Considering the length of time that it takes to move from initial approval to construction (2 to 3 years), and that it takes 2 to 3 years from construction to occupancy for a high-rise apartment, 1.5 to 2 years for a mid-rise, and 1 to 1.5 years for a low-rise apartment; the timelines for supportive and deeply affordable housing developments by type are as follows, from initial approval to occupancy:

- High-rise 2 to 3 plus 2 to 3 = 4 to 6 years
- Mid-rise 2 to 3 plus 1.5 to 2 = 3.5 to 5 years
- Low-rise 2 to 3 plus 1 to 1.5 = 3 to 4.5 years.

This means that the cut-off year for initial approval by type that will allow unit occupancy no later than 2030 is:

- High-rise Jan. 2025 to Jan. 2027
- Mid-rise Jan. 2026 to June 2027
- Low-rise June 2026 to Jan. 2028

As such, TAEH supports the City in its plans to find ways to shorten the time between initial approval and construction through streamlining, simplifying, and rationalising of the planning approval process.

Likewise, we recommend the City prioritise obtaining funding for construction of approved developments over the next 2 years, while high-rise developments can still be started with the expectation that they will be finished and occupied before the end of the Housing Action Plans in 2030.

We also support the City in finding new ways in which private funding for such projects in the non-profit sector can be encouraged.

Focusing on the Non-Market Housing Sector.

TAEH agrees that there is a need to shift “the housing system to deliver more non-market housing.” We do believe that the private homeowner and the non-market housing sectors are both needed for the City to reach its housing goals. We note that the City, through judicious policy changes, such as the new exemption of multiplex development from the site plan application process, will encourage private homeowners to generate additional affordable housing units through economic self-interest, and create the opportunity for City Planning staff and resources to process non-market housing developments more quickly and efficiently.

In this way, the City’s involvement in achieving the goals of the Housing Action Plans will consequently shift to focus on the non-market housing sector, both through its own developments at Toronto Community Housing Corporation, the Toronto Seniors Housing Corporation, and those of the private non-profit housing development sector, including Community Land Trusts and not-for-profit housing co-operatives.

To monitor the level of housing stock more accurately, this shift must be accompanied by a robust method to count the number of affordable housing units that are, or will be, created by the private sector. The City must establish a strategy for ensuring that all affordable units are included in the data.

We recommend the City significantly increase the budget for the MURA (Multi Unit Residential Acquisition) programme so that it can be accessed on a rolling basis as the need arises

Advocacy Efforts.

Finally, TAEH offers to support the City in its requests to the federal and provincial governments for a funding investment in Toronto’s housing sector that is targeted to meet the particular needs of Toronto’s population on an equitable, as opposed to an equal, per capita, basis.

Conclusion.

TAEH congratulates the City on this proposal for a “Generational Transformation of Toronto’s Housing System.” We are confident that the City has both the will and the capacity to achieve our shared goals in relation to the Housing Action Plans by the end of 2030, provided the federal and provincial governments enhance their current levels of partnership.

Achieving these goals will not only provide supportive and deeply affordable housing for those currently housed who are living in unaffordable conditions, but also result in the housing of the City's homeless, through programmes such as the COHB, other RGI funding, transitional housing with support services, and other forms of rent/income subsidies. By doing so, we will achieve the goal of TAEH, to make homelessness rare, brief, and non-recurring.

Thank you,



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