

# Reconfiguration and Additional Improvements to the Modular Housing at 175 Cummer Avenue

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Submission to Toronto City Council

June 15, 2023

Submission by: Right to Housing Toronto



To

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

Dear Deputy Mayor McKelvie and Members of Council,

**Re: MM7.21 - Reconfiguration and Additional Improvements to the Modular Housing at 175 Cummer Avenue - by Councillor Lily Cheng, seconded by Councillor James Pasternak**

We are writing to express our concern regarding Councillor Cheng's motions to delay the modular housing projects at 175 Cummer Avenue. 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.

Modular housing has presented itself as a relatively quick and effective way of delivering more permanent and deeply affordable housing options for a cross-section of our city's residents among whom many experience chronic homelessness. Often, they face mental health challenges as well. Increasingly, they have been finding temporary relief through the City's shelters, a system that is currently overwhelmed and by no means a long-term, adequate housing option that secures the right to housing for Torontonians.

We are therefore disappointed to see two proposed motions that would effectively slow down or potentially halt the development of modular housing at Cummer Avenue, a proposal that is at odds with otherwise relatively positive developments with new modular units coming up in places such as 540 Cedarvale Avenue. What has helped move such projects forward is partly grounded in the City's Housing Charter, notably a principle that:

*"All residents have a right to equal treatment with respect to housing, without discrimination contrary to the Ontario Human Rights Code and to protection against arbitrary requirements that result in discrimination based on membership in groups protected by the Code or on homelessness or housing status."*

We want to remind the City of its commitments to progressively realizing the right to housing and that such principles matter. While it is important to hear out the concerns of residents where new developments are proposed, a rights based approach to housing prioritizes the needs of those most in need. It is also important to note that consultations were held in the past, both virtually and in person, deliberations that did not deter this project from progressing. Such conversations must not be discounted, nor should studies conducted in the past that lay the groundwork for such an important initiative to come to life.

For these reasons, we urge council to vote against the motion.

Thank you,  
On behalf of Right to Housing Toronto (R2HTO)