



**MORE NEIGHBOURS  
TORONTO**

Dear Members of the Planning and Housing Committee,

**RE: PH7.8 Recommended Framework for the Community Infrastructure and Housing Accelerator (CIHA) Tool**

***About More Neighbours Toronto***

[More Neighbours Toronto](#) is a volunteer-only organization of housing advocates that believe in building more multi-family homes of all kinds for those who dream of building their lives in Toronto. We advocate for reforms to increase our city's ability to build more homes in every neighbourhood. We are a big-tent organization with members across the political spectrum who are committed to counterbalancing the anti-housing agenda that has dominated Toronto's politics, created an affordability crisis, and cost burdened a new generation of aspiring residents. We are firmly committed to the principle that housing is a human right and believe Toronto should be inclusive and welcoming to all.

***Position***

**More Neighbours Toronto believes that new tools are needed to solve the housing crisis, and supports the recommended framework.** We agree with the Chief Planner and Executive Director that the Community Infrastructure and Housing Accelerator tool has a role to play, especially in meeting targets for affordable housing, supportive housing, and purpose-built rental housing construction.

Particularly in light of increasing construction costs, rising interest rates (making financing construction more costly) and ever-increasing pressure on the shelter system, it is important to make it as easy as possible to build affordable housing. The CIHA tool may allow more certainty and quicker decisions for providers of non-market and/or rental housing, allowing more of it to be built.

More Neighbours strongly supports the framework's focus on affordable housing that will actually be built in a timely manner. We would also like to see consideration of how the CIHA tool can be used to support the City's overall housing targets (including market rate housing).

An additional advantage of adopting the framework is that it provides democratic control and oversight to a process that relies on ministerial discretion. Having a defined framework for which applications to put through the CIHA process will ensure that all development applications are treated equally, reducing the potential for corruption.

However, the CIHA tool should be treated as one tool among many. There is always the possibility that a request will be denied, or that the Minister will not respond as quickly as we would like.

175 Cummer Avenue, the site of a City of Toronto project to build modular, supportive housing on City-owned land, is an excellent example of the perils of both antiquated zoning and reliance on provincial intervention to allow construction. Had the site (and the rest of residential land throughout the city) been more permissively zoned, the City would not have needed rezoning to create new supportive housing units. There would have been no need to request an MZO, nor to go through a lengthy and expensive rezoning. Housing for several dozen of our most vulnerable residents could have been built and occupied months ago; instead, we wait for an OLT hearing.

Given the limitations of spot rezoning and provincial tools (whether MZOs or the CIHA tool), More Neighbours urges the Planning and Housing Committee to avoid overreliance on these strategies and to forge ahead with the important work of removing systemic barriers to housing construction. Examples of such work include the recent decision to legalise multiplexes with no FSI limits. Upcoming opportunities to make meaningful progress would include expanding permissions for low-rise apartments and mid-rise buildings.

MZOs and the CIHA tool should be used as supplements to help meet the City's housing targets, not as a replacement for introducing more permissive zoning and reducing unnecessary red tape.

Regards,

Alena Parkinson  
More Neighbours Toronto