



## Palmerston Residents' Association

Planning & Housing Committee  
Toronto City Hall  
100 Queen Street West  
Toronto, ON  
M5H 2N2

May 8, 2024

Dear Members of Planning and Housing Committee,

### **Re: 2024PH12.3 – Expanding Housing Options in Neighbourhoods: Major Streets Study - Final Report**

As members of the Palmerston Residents' Association, we represent the interests of residents residing in the area bounded by Grace and Bathurst Streets to the West and East and College and Bloor Streets to the South and North.

We are writing in support of the various amendments (the “**Proposed Amendments**”) described in the report of the Interim Chief Planner and Executive Director, City Planning dated April 24, 2024 (the “**Report**”).

Torontonians, both current and future, need affordable places to live. The City has recognized this fact in its HousingTO 2020-2030 Action Plan which states that the “City’s policy approach to housing [is] one that begins and ends with human rights”. The Plan goes on to state that this human rights-based approach is “based on the need to ensure that all residents have equal opportunity to thrive and on the recognition that adequate housing is essential to the inherent dignity and well-being of the person and to building healthy, sustainable communities”.

While we wholeheartedly support the Proposed Amendments, we would like to devote this letter to address what we see as a conservative impulse in sections of the Report which undermines the City’s human rights-based approach to housing.

In support of the Proposed Amendments, the Report states that “townhouses and small-scale apartment buildings have been providing housing in many Toronto neighbourhoods for generations.” While innocuous on its face, statements like these are representative of a pernicious assumption that density in Toronto’s neighbourhoods is better where it mimics the built form of those neighbourhoods in the past. This assumption is pervasive in housing discourse in Toronto and undermines a human rights-based approach to the issue.

Put simply, we will not fix Toronto’s housing crisis if we are burdened by compliance with the building standards of an imagined past. The HousingTO Action Plan describes several aspects of the human rights-based approach to housing – housing should be affordable, accessible, habitable etc. Nowhere in the human rights-based approach to housing is there a requirement that built forms which would provide access to affordable, accessible and habitable housing align with the built forms traditional to neighbourhoods. Where the City privileges, or even considers, the consistency of current housing policy with historical standards the City embraces a fundamentally conservative standard that undermines its commitment to housing as a human

right. Put another way, Toronto's housing problem will not be solved by paying deference to the built forms which caused the crisis.

We wish to make clear that this argument does not in any way undermine the worthiness of true heritage and historical preservation. On the contrary, if every aspect of Toronto's neighbourhoods is worth of historical preservation, then none of it is.

Perhaps more fundamentally, by paying blind deference to the built forms of the past we bind the hands of our political community in the present, thereby limiting our ability to live up to our commitments to one another (whether in respect of housing or otherwise).

We commend City staff for their work in preparing this Report and look forward to working together to build a city which provides for the human rights of Torontonians even when inconsistent with past practice.

Regards,

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Co-Chairs  
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