

PH13.9 Community Housing Sector Modernization and Growth Strategy

Submission by Melissa Goldstein
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Members of Toronto City Council,

While I am all in favour of this strategy to support and grow the community housing sector, I was disturbed to see that staff are recommending a change to the MURA program to allow not-for-profit housing providers purchase condo units to be operated as affordable rental housing.

MURA is not simply an acquisition program to grow our nonmarket housing stock. It is the City's ONLY affordable housing preservation program designed to both preserve the City's at-risk affordable rental housing in the private market and prevent the displacement of tenants from their homes.

The number of existing affordable housing units at risk of being lost is huge: between 2016 and 2021, Toronto lost an average of **14,618** affordable private market units each year—units with rents below \$1,000/mo. Yet even with this large increase in MURA funding, the program will only be able to acquire 500 units a year; 500 units is just over 3% of the affordable units the City loses each year. MURA funding is already wholly inadequate for the overwhelming task of preserving at-risk private market affordable housing and preventing tenant displacement; it should not be used for other purposes like buying new condo units. It's also not a good use of public funds: existing affordable units are considerably less expensive than a new condo, even new condo that is for sale at a serious discount, and there is no added benefit of the savings incurred through preventing displacement and homelessness.

Recommendation: Expand the size of property that is eligible for MURA, but restrict the program to the purchase of existing private market affordable rental housing.

I wanted to raise the issue of making sure we really are using all the tools available to us. The staff report notes that provincial changes have limited the impact of Section 37 density bonusing, and Inclusionary Zoning programs for creating new affordable rental housing. While this is unfortunate, Toronto has another tool that it has not yet explored: using the City's authority under COTA 453.1 to pre-zone land to allow higher densities for properties that include a "social housing program" – which COTA defines as social or non-profit owned housing. We are currently increasing the allowable density across the City as of right for housing without any requirements that the housing be affordable, without considering the possibility that Toronto may be able to encourage the development of nonprofit housing specifically using its authority under COTA by implementing as of right zoning that allows increased density with increased nonmarket housing.

For example, in an area where the City is now permitting sixplexes, the City might also be able to allow an eightplex if the property was 50% social or nonprofit owned housing and allow a tenplex if the property was 100% social or nonprofit owned housing. While some may believe that the City does not actually have the authority to do such a thing under COTA, I think that if the City of Toronto truly wants to use every tool in its toolbox, staff should investigate the full potential of this tool. At least then we'd know.

Recommendation: Direct staff to investigate whether the City's authority under COTA 453.1 would allow the City to encourage the growth of community housing by increasing the allowable density as of right for development that includes a social housing program, and if so, to explore the potential for implementing zoning that allows increased density in step with increased units of social housing.

Appendix:

City of Toronto Act (COTA) 453.1:

Zoning densities

(2) Without limiting section 113, in a by-law passed under [section 34](#) of the [Planning Act](#), the City may, in addition to establishing densities under the authority of that section, establish one or more residential densities of development applicable to any land in respect of which the owner of the land and the operator of the housing accommodation, if different from the owner, agree with the City to provide all or such proportion as specified in the by-law of the housing accommodation located or to be located on the land, for the purpose of a social housing program. [2006, c. 32](#), Sched. B, s. 95.

COTA's definition of social housing program:

"social housing program" means a program or project that,

(a) is entirely owned or operated by or is leased to and operated by a non-profit housing co-operative as defined in the [Co-operative Corporations Act](#) or a non-profit corporation as defined in the [National Housing Act \(Canada\)](#) and that, in the opinion of the City, is designed to provide housing accommodation primarily for persons with low to moderate incomes, at a charge not exceeding the greater of,

(i) the amount required to finance, operate and maintain such accommodation without profit, and
(ii) the amount required to be charged for such accommodation under the terms of an agreement respecting the financing of the accommodation where one party is the provincial or federal government or an agent of either, or
(b) provides housing accommodation that is owned and operated by or on behalf of Toronto Housing Company Inc. or Toronto Community Housing Corporation. [2006, c. 32](#), Sched. B, s. 95."