



Dear Members of the Planning and Housing Committee,

RE: 15.5: 2023-2024 Annual Progress Update Report - HousingTO 2020-2030 Action Plan and Housing Action Plan (2022-2026)

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 is concerned about the lack of progress being made on HousingTO and the Housing Action Plan. While we welcome and support the investments into supportive housing and the Building Faster Fund, as well as the requests to other levels of government for support, these actions must also be accompanied by speedier action from City Council to meet the targets of the Housing Action Plan.

City staff have put in admirable work in advancing the Housing Action Plan, and we applaud their efforts to date. Nevertheless, there are major items in the Housing Action Plan that are seeing substantial delays compared to the initial timelines identified in 2023.EX.3.1 and 2023.EX 9.3. In particular:

Work Plan Objective	Work Plan Deliverable	Initial Timeline¹	Previous Timeline²	Updated Timeline³
<i>Official Plan, Zoning and Guidelines Amendments - 10 Items</i>				
Official Plan, Zoning and Guideline Amendments - Avenues and Mixed-Use Areas	As-of-right zoning for mid-rise buildings along Avenues where an Avenue Study has resulted in an Official Plan amendment or Urban Design Guidelines but with no implementing zoning - Proposals report	Q4 2024	Q1 2024	Q4 2025
	Updates to Mid-rise Rear Transition Performance Standards Final Report	Q2 2023	Q1 2024	Q4 2024
	City-wide Zoning performance standards to implement as-of-right Mid-rise development on Avenues – Final Report	Q4 2023	Q1 2024	Q4 2024

Work Plan Objective	Work Plan Deliverable	Initial Timeline¹	Previous Timeline²	Updated Timeline³
	As-of-right zoning for mid-rise buildings along Avenues where an Avenue Study has resulted in an Official Plan amendment or Urban Design Guidelines but with no implementing zoning - Final Report	Q4 2024	Q4 2024	Q4 2025
	Expanding Mixed Use Areas	Q1 2024	Q1 2025	Q4 2025
Official Plan, Zoning and Guideline Amendments - Major Growth Areas	Quayside- Update on Deliver Plan for Affordable Housing	Q4 2023	Q1 2024	Q1 2025
Official Plan, Zoning and Guideline Amendments - Increasing Permissions for Housing and Addressing Exclusionary Zoning	Simplified and modernized zoning by-law for low-rise residential zones - Phase Two Proposals Report	Q4 2024	Q4 2024	Q3 2025
	Facilitating Apartment Infill - Final Report	Q4 2024	Q4 2024	Q1 2025
	Incorporating Low Rise Residential Lands into ZBL 569-2013 Final Report		Q4 2024	Q4 2024 - Q3 2025
	Official Plans to Support Inclusive Growth – Updating Neighbourhoods and Apartment Neighbourhoods Policies (Chapter 4)	Q1 2024	Q1 2025	Q4 2025
<i>Leveraging Public Land - 8 Items, including 4 Rezoning applications</i>				
Leveraging Public Land to Increase the Supply of Housing	Rezoning application for 40 Bushby Drive (Housing Now)	Q1 2024	Q2 2024	Q3 2025
	Rezoning application for 1631 Queen Street East (Housing Now)	Q3 2023	Q2 2024	Q1 2025
	Rezoning application for 251 Esther Shiner Boulevard (Housing Now)	Q1 2024	Q4 2024	Q4 2025
	Rezoning application for 1250 Eglinton Avenue West (Housing Now)	Q4 2023	Q3 2024	Q4 2025
	Identify options to improve the financial viability of Toronto Community Housing Corporation in-flight and planned revitalization and infill projects, while delivering a wider range of net new homes	Q2 2023	Q3 2024	Q2 2025

Work Plan Objective	Work Plan Deliverable	Initial Timeline ¹	Previous Timeline ²	Updated Timeline ³
	and city-building uses			
	Strategy to Encourage Creation of Housing on School Board Land		Q3 2024	Q3 2025
	Post-Secondary Housing Strategy	Q4 2023	Q3 2024	Q1 2025
	Identify Transit-Oriented Community Sites that could result in significant affordable housing	Q4 2023	Q2 2024	Q4 2024
Advancing Housing System Policies and Programs - 4 Items				
Advancing Housing System Policies and Programs	Launching the new Affordable Housing Access System		Q4 2025	2026
	Accessible Housing Initiatives	Q2 2023	Q1 2024	Q3 2024
	Identify lands owned by non-profit, Indigenous and co-op housing providers, as well as faith groups Q2 2024 Q1 2025		Q2 2024	Q1 2025
	Engage with United Way of Greater Toronto with a particular focus on community service infrastructure needed for		Q2 2024	Q1 2025

¹ As reported in EX 3.1

² As reported through EX 9.3

³ Status as of Q2 2024

Many of the timelines in EX 3.9 were *already delayed* from the original timelines in EX 3.1, meaning that the new timelines will *further* postpone the items. As for the items that are projected to be completed by Q4 2024, it is unclear whether that deadline will be met given that there are 3 months left to the year and the items have not yet been brought before the Committee. There are also four rezoning applications under the Housing Now program that will be substantially delayed for about 2 years, which contradicts the goal of the Housing Now program to deliver housing quickly.

As this Committee, Council, and the Mayor have recognized, we are in a housing crisis. This crisis has severe ongoing impacts on affordability, homelessness, and the quality of life for Torontonians. Every month of delay in these much-needed reforms is an additional month in which the crisis goes unaddressed. Delays mean that homes remain unbuilt and rents continue rising. Housing delayed is housing denied.

Given that homebuilding will take time even after the reforms are passed, we urge the Committee and Council to urgently speed up the implementation of the Work Plan Objectives. The Committee could work with city staff to identify (i) the source of the delays, (ii) ways to accelerate the process, and (iii) key items that can be addressed quickly.

The reforms identified in the Housing Action Plan are valuable and could make a substantial difference in improving housing affordability. We call on the Committee to expedite the process so that Torontonians can get started on building housing for all.

Housing Accelerator Funding

This report states that “The City received an allocation of \$471 million from the Government of Canada through the Housing Accelerator Fund (HAF)...” In fact, the City received the first of four installments and the remaining installments are contingent on hitting milestones. The City has not released the Confidential Attachment with the Key Terms and Conditions but More Neighbours obtained some dates through a Freedom of Information request that suggest the City will miss some milestones that it committed to and that are related to HAP items:

HAF Item	HAF Date	HAP Item	HAP Date
I4.MS4 Report on BC-style MTSAs	2024-06-30	Not included in HAP	??
I4.MS5 Complete Zoning amendments for as-of-right approval in MTSAs	2026-09-30	Zoning Review for MTSAs	Q4 2024
I7.MS2 Complete study for as-of-right mid-rise	2024-06-30	As-of-right zoning for mid-rise buildings along Avenues where an Avenue Study has resulted in an Official Plan amendment or Urban Design Guidelines but with no implementing zoning	Q4 2025
I7.MS3 Report back on 4 storeys, 6 units	2024-06-30	Not in HAP, no report back yet	??

HAF Item	HAF Date	HAP Item	HAP Date
17.MS5 Review of no net new shadow, including mid-rise design guidelines, including proposed by-laws to implement	2024-09-30	Shadow policy review not in HAP but “City-wide Zoning performance standards to implement as-of-right Mid-rise development on Avenues – Final Report”	Q4 2024
17.MS6 Post-secondary affordable housing strategy, including parking review	2024-12-30	Post-secondary housing strategy	Q1 2025
18.MS1 Interim report on apartment infill	2024-06-30	Housing Action Plan: Apartment Infill Study - Preliminary Report	Q3 2024
18.MS2 Final report on facilitating apartment infill	2024-12-31	Facilitating Apartment Infill - Final Report	Q1 2025

Even many of the deadlines listed in PH15.5 seem optimistic. For example, the Apartment Infill Preliminary Report from July 2024 includes a work plan where a Proposal Report is due back in Q2 2025 with a final report in Q2 2026, so it is unclear how the Q1 2025 deadline listed here will be achieved. The as-of-right zoning for mid-rises lists both the proposals report and the final report as due back in Q4 2025. There is no indication of when items like expansion of 4-storey + 6-unit permissions or the shadow policy review will be back. Given that the next funding installment depends on a progress report that should be due in January 2025, the City seems likely to miss multiple milestone deadlines, which could jeopardize this funding if the City does not move more quickly on these key items.

The as-of-right zoning in Major Transit Station Areas deserves special attention because Toronto has been waiting on approval of its submitted MTSAs from the province, which does not seem to be forthcoming. What, then, is the meaning of the Q4 2024 date in this report? Does the City have an alternate plan for implementing zoning around transit? Could the City update its Official Plan and land use designations in these areas outside of the provincial MTSA program? [London, ON recently approved much more ambitious as-of-right housing permissions near transit](#) despite a lack of the higher-order transit that Toronto enjoys. This demonstrates the sort of independent action Toronto should be taking given the absence of provincial movement on MTSAs.

Downsview Park

More Neighbours Toronto is excited to see the Memorandum of Understanding between the City and Canada Lands come forward. We are supportive of the goal to support a large amount of affordable housing on public lands in Downsview Park. However, as City staff and the proponent work to finalize the secondary plans for these first two districts, we believe there are opportunities to achieve more housing in both districts based on the most recent plans that have been publicly shared.

In particular, the maximum heights in the Arbo district seem arbitrarily limited at 30 storeys and 95 m. More concerning, the heritage preservation efforts for the Depot site in the Downsview West district are an impediment to housing. The most recently available plans involve bisecting the existing large building to construct a new through street to Sheppard Ave West and the GO tracks. However, they do not permit the construction of housing above the heritage property. More Neighbours volunteers raised these concerns at the most recent public meeting for the district. Integrating this heritage property into new mixed use properties would allow for more housing in Downsview West while preserving any important heritage characteristics. It would also facilitate maintaining the current uses of the site, including a popular farmer's market.

Now is the best time to make these important improvements to the secondary plans before they are brought forward to council for review.

Regards,
Hongyu Xiao
More Neighbours Toronto