



**MORE NEIGHBOURS
TORONTO**

March 17, 2025

RE: 2025.PH19.4 Facilitating Building Approvals for Modular Construction and Streamlining Toronto Building's Certified Plans Program - Update

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.

Dear Members of the Planning and Housing Committee,

More Neighbours Toronto would like to applaud the work thus far of City Staff, this Committee, and Council to further streamline and speed up the City's approvals process for standardized design templates and modular components. Both these steps will contribute to the end goal of getting more dearly needed housing built – faster and cheaper – and help to address our city's housing crisis.

Through recognition of the CSA A277 Standard, Toronto Building significantly reduces inspection times for certified modular construction manufacturers and enables the usage of this promising new technology and construction modality. At a time when our entire country faces uncertainty due to US tariffs and the uncertain future of our existing industrial capacity, the possibility of retooling manufacturing towards modular construction presents us with an opportunity to address two major crises at once.

Expanding Toronto Building's Certified Plans Program to now include ADU's and housing formats up to multiplexes – and possibly beyond – also promises financial and time savings at the permitting step. This addresses the requirement outlined by then Housing Minister Fraser as part of the Federal Government's HAF agreement with the city:

"Where enabled by legislation, establish pre-approved designs including for four unit multiplexes, and accessory dwelling units like garden and laneway suites;"

More fundamentally, this will also better set up CMHC's recently released Housing Design Catalogue for success. The volume of uptake from Toronto for the Catalogue designs and materials will be a key factor in driving production efficiencies of scale and catalyze uptake by other municipalities in the province. As is generally acknowledged, Toronto's housing crisis has contributed to the housing crunch in other jurisdictions so it is only fair that we play a role in alleviating the issue.

Combined, these two initiatives promise to provide benefit greater than the sum of its parts. More Neighbours Toronto commends Toronto Building for its consultation with the building industry on both these endeavours and implementing logical and proactive process improvements. When CMHC releases the final architectural design packages for the Catalogue later this Spring, we look forward to their swift inclusion as part of the Certified Plans Program.

Best Regards,
Brian Cheung, Board Member
More Neighbours Toronto