



July 5th, 2022

Deputy Mayor Ana Bailão
Chair of the Planning and Housing Committee
Toronto City Hall
100 Queen Street West
Toronto, ON M5H 2N2

Dear Members of the Planning and Housing Committee,

Re: PH35.14 Our Plan Toronto: Land Needs Assessment

We are writing to you regarding how we believe Toronto should plan its growth based on the recently published Land Needs Assessments. We are representatives of the Right to Housing Toronto (R2HTO), a network of organizations and individuals working to support the implementation of the right to housing by the City of Toronto.

The City's Official Plan review process has provided an important opportunity for many communities to reflect on and contribute to conversations related to what kind of city they want Toronto to become over the coming years. As the housing crisis worsens, the commitment the City has made as a result of these past consultations, to aspire for more inclusivity and eliminate disparities, is salient.

The Land Needs Assessment has provided important context for the scale and complexities of the task ahead. Notably, the data suggests that over the long haul the projected supply of new and existing housing will be more than enough to house a population that will grow by at least 700,000 people over the next 30 years. Even in a scenario with significantly more people coming into the city, the projected stock of housing will be able to comfortably accommodate them in general. However, these general findings mask the fact that specific types of housing are lacking. For example, there appears to be more demand for purpose-built rentals and ground-related homes than is projected to be available unless action is taken. Indeed, these longer-term scenarios do not offer much comfort given the current housing crisis that is affecting so many of our residents across the city, particularly those from low-income households.

To move forward in a meaningful way, information sources such as the Land Needs Assessment should be complemented by applying a rights-based approach to housing. In practice, this partly means developing growth plans and associated housing strategies that are needs based. To some extent, initiatives such as Expanding Housing Options in Neighbourhoods to fill the gap of the "Missing Middle"

is an example of this approach but it's only scratching the surface. More needs to be done to carve out spaces for purpose-built rentals and deeply affordable housing options.

Indeed, affordability is a crucial element of what constitutes the right to adequate housing and as such, this consideration ought to remain front and center for planning exercises and related city measures. This could mean broadening the scope of needs assessments to look more closely at income and related affordability measures, which in turn, could help strengthen city policies such as Inclusionary Zoning. Plus, applying this lens has the potential of strengthening the replacement policy to protect affordable rental units. It is also worth noting that given longer term projections of abundant supply of housing, concerns about such regulations disincentivizing construction are likely overblown.

A rights-based approach to planning also involves strengthening outreach and deepening engagement with as many communities across our diverse city. It is these interactions that add human experiences and meaning to aggregate data and offer a much more nuanced picture into what a home really means for communities. This process can help create culturally adequate homes that are also in cohesive and well-resourced neighbourhoods, all of which are integral to realizing the right to adequate housing.

Thank you,

On behalf of the Right to Housing Toronto