



Centre for Equality Rights in Accommodation
Centre pour les droits à l'égalité au logement

May 31, 2022

Expanding Housing Options in Neighbourhoods
City Hall, East Tower
100 Queen St. W, 12th Floor
Toronto, ON M5H 2N2

Dear Members of the EHON Team,

Re. EHON Multiplex Study – Draft Official Plan Amendment

On behalf of the Centre for Equality Rights in Accommodation (CERA), I am writing to voice our support for the Draft Official Plan Amendment developed through the Expanding Housing Options in Neighbourhoods (EHON) Multiplex Study, currently released for consultation. We are Canada's leading non-profit organization working to advance the right to adequate housing. We advance the right to adequate housing by providing free services to renters facing evictions and human rights violations to remain housed, by providing education and training about housing rights across Canada, and by advancing rights-based housing policy through research and policy advocacy.

Toronto is facing a housing crisis of an unprecedented scale. Recognizing the severity of this situation, in 2019, the City adopted a rights-based approach to housing and committed to taking meaningful steps to ensure that all residents have access to adequate housing. In this context, CERA has been closely monitoring the City's efforts to tackle the "Missing Middle." Allowing for more gentle density and greater housing diversity across our neighbourhoods is an essential part of a balanced approach to managing Toronto's population growth and advancing the right to housing. Indeed, it is striking that 70% of lands designated as "Neighbourhoods" are only zoned for detached houses and secondary suites.

We are also acutely aware of the resistance that the City faces to its efforts to increase density, in particular in residential neighbourhoods. This was evidenced during past engagements related to the City's Official Plan, where many participants expressed a preference for the status quo. Notwithstanding such sentiments, the fact that the proposed Official Plan Amendments have proceeded this far is an encouraging sign that Toronto residents are supportive of an evidence-based approach to addressing current housing challenges.

CERA is supportive of several aspects of the draft amendment, while we also have suggestions to strengthen the proposal. If adopted, the changes could make a significant contribution to creating more inclusive neighbourhoods, an important step in responding to Toronto's housing crisis.

First, the draft amendment has done well to go beyond the general problem of a housing shortage and focus on the specific types of housing need. For example, by promoting multiplexes with larger units as opposed to condominiums, the plan can better respond to the housing needs of families. The potential for intergenerational housing options through this amendment is a testament to the initiative's responsiveness to Toronto's diverse demographics. We are also pleased to see the draft amendment

encourage universal access for units on the ground floor, a provision that amplifies a rights-based approach to housing.

Second, there are some notable changes pertaining to urban design. We believe an appropriate balance has been struck between removing elements that perpetuate exclusionary zoning and keeping provisions that contribute to a sense of place and community for both new and longstanding residents. In other words, it is reasonable to strike the requirement to maintain “prevailing building types”, while respecting other aspects such as heritage conservation. It must be noted, however, that as demographics change, design preferences may likely evolve and future opportunities for engagement should be made available to gauge whether standards remain culturally adequate, a significant element of a rights-based approach to housing.

Requirements to protect green space are also reasonable conditions to ensure whatever environmental gains accrued from density are not lost, in part, through development that discounts conservation. This represents a necessarily holistic approach to managing growth. We also hope that new provisions encouraging adoption of sustainable building practices is supported over the longer term with other tools available to the City to tangibly change behaviour.

Finally, we have one significant caveat. While greater diversity in housing options may be produced through this initiative, it is not entirely clear that these options will be affordable for a significant portion of the city’s population. The recent introduction of the City’s Inclusionary Zoning policy is a partial response to the needs of low- and moderate-income households who are struggling to find and live in affordable housing options. Past reports on EHON suggest that the City is aware of this shortcoming but little has been done to consider how this initiative can also address the most pressing of matters in public affairs today – housing unaffordability.

Much like the draft Official Plan Amendments’ encouragement of larger units and sustainable building practices, we propose that the City consider similar language promoting affordability as a key feature of the potential new stock of multiplexes. Distinctions could also be made between rental and ownership options. It is also well worth looking into the feasibility and legality of using zoning to prioritize affordable housing options, for example by allowing for increased density where affordable multiplexes will be built. Similar initiatives are being [explored](#) in other major cities across Canada and could be piloted in select neighbourhoods in Toronto as well. In addition, we encourage the City to study how non-profit housing providers can be supported by linking existing schemes such as Open Doors with filling the Missing Middle.

Increasing access to housing that is affordable for Toronto’s residents is an essential component of advancing a rights-based approach to housing. This model offers an integrated way of ensuring housing policy is adapting to the constantly evolving needs of Toronto’s diverse population.

We look forward to providing more of our housing expertise and welcome further discussions with the City to ensure its housing initiatives are effective and rights-based.

Thank you,

A handwritten signature in cursive script, appearing to read "B. Shalpour". The signature is written in dark ink on a white background.

Bahar Shadpour

Director of Policy and Communications
Centre for Equality Rights in Accommodation (CERA)

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