

# Submission to the City of Toronto HousingTO Consultation

## July 2019 – Executive Summary

This document summarizes the TAEH submission for the City of Toronto's new 10-year housing plan, *HousingTO*. With housing as a human right as our foundational starting place, our submission is divided into four sections:

- A. Realizing the right to housing;
- B. Creating more access to deeply affordable housing supply;
- C. Supportive housing as the solution to chronic homelessness; and
- D. Ensuring accountability.

### A. Realizing the Right to Housing

TAEH supports a rights-based approach as a foundation for *HousingTO* — our advice in relation to human rights draws from various sources including the National Housing Strategy, Right2Housing TO campaign, and the work of TAEH's Human Rights Working Group (formerly HomeComing). The City should act in these main areas:

#### End discriminatory practices

- Review the Official Plan and Zoning By-Laws to remove provisions that exclude rooming houses, define some land uses by type of occupancy, and limit small units or lots.
- Train City staff in human rights principles and end discriminatory consultation practices.
- Accelerate the reduction of rental property taxes down to homeowner levels.
- Review all municipal practices to avoid making low-income or vulnerable tenants homeless.
- Extend the recent Official Plan Amendment protecting dwelling rooms in the old City of Toronto to all parts of the City

#### Promote participation

- Engage tenants, homeless people, and those in precarious housing, in making housing policies and promote engagement at all levels, not just the housing file.

## **B. Creating More Access to Affordable Supply**

Everyone experiencing homelessness has an affordability problem that results from both inadequate income support and unaffordability to available supply and new development. These recommendations speak to what the City can do to end homelessness.

- Develop an ambitious Inclusionary Zoning strategy, including affordability below average market rent, ambitious volumes, and perpetual affordability.
- Permit homes suited to a variety of income levels and household types in all neighbourhoods.
- Ensure affordable housing stays so for the long term, under non-profit or co-op ownership.

## **C. Supportive housing – the solution to homelessness**

TAEH urges the City to make supportive housing a main priority in *HousingTO*. Supportive housing combines affordable housing with support services, enabling people experiencing chronic or episodic homelessness, or serious mental health issues, to maintain stable housing.

### **The City's role in supportive housing**

The City has a key role in supportive housing — including funding Alternative Housing and Habitat Services; Toronto Community Housing units; helping homeless people access housing with housing allowances and supports; and funding supportive housing as part of new affordable rental housing.

### **New resources and opportunities**

Some additional resources to help meet supportive housing needs are available or soon will be:

- The National Housing Strategy offers extra Federal funding to create new affordable housing.
- A new Canada-Ontario Housing Benefit program will provide portable rent subsidies.
- New Federal-Provincial agreements provide extra funding for community mental health services.
- More non-profit housing providers have mortgage-free sites that can help create more housing
- The City is offering more land and has plans to expand the Housing Allowance Program.

### **Supportive Housing Goals for HousingTO**

- Embed ZERO TO goals to end chronic homelessness, in the *HousingTO* plan.
- Prepare and adopt in 2020 a supportive housing growth/implementation plan, prepared collaboratively with TAEH, and including specific action steps and resources.

- Set specific achievable annual supportive housing targets, with funding to implement them.

### **Action steps to reach supportive housing goals**

- Offer more City resources to create more supportive housing — capital, land, rent subsidies, and support funding — in ways that enhance and complement Federal and Provincial funding.
- Quickly assess/match homeless people to services they need, building on current TAEH work.
- Use portable housing allowances to offer supportive housing tenants options to move on.
- Develop a specific recipe to offer providers a unified package of City resources, Federal National Housing Strategy resources, and Provincial support funding/rent supplement.
- Work with Ontario Health Teams and Provincial agencies to coordinate support funding.
- Enhance supportive housing development capacity.
- Expedite land use and regulatory approvals.
- Include supportive housing in City Sites developed for affordable housing.
- Obtain supportive housing units through Inclusionary Zoning.
- Enhance City Resources.
- Commit all City divisions to facilitating supportive housing development.

## **D. Ensuring Accountability**

In accordance with the National Housing Strategy’s four principals in the right to housing, TAEH encourages strong accountability for the implementation, monitoring, reporting and delivery of *HousingTO*.

- Require a multi-department “all of government” approach to implementing *Housing TO*.
- Make *HousingTO* a real plan with resources, action steps, and annual reporting.
- Strengthen Toronto’s Housing Charter to support the right to housing for every resident.
- Have the Mayor and City Manager lead on housing, and have decision making at one Council committee.
- Establish an accountability framework, such as a Toronto Housing Advocate and Housing Council similar to the national level.

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## Introduction

### Purpose of this document

TAEH has prepared this document as its official submission for the City of Toronto's new 10-year housing plan, *HousingTO*. It is submitted in the context of the City's consultations for that plan. We take housing as a human right as a foundational starting place, and organize our advice into four sections below:

- A. Realizing the right to housing;
- B. Creating more access to deeply affordable housing supply;
- C. Supportive housing as the solution to chronic homelessness; and
- D. Ensuring accountability.

### About TAEH

The Toronto Alliance to End Homelessness (TAEH) is a community-based collective impact initiative that recognizes the critical importance of working in a new way towards our common vision of zero chronic homelessness in Toronto. This includes working with all levels of government, particularly the City of Toronto to achieve our vision.

TAEH has a strategic partnership with the City of Toronto. We share a goal of creating more effective solutions to homelessness. TAEH is the community planning table recognized by the Shelter, Support and Housing Administration (SSHA) and the Housing Secretariat for the City's service system planning for all investments addressing homelessness in Toronto. This includes but is not limited to our role as the Community Board (CAB) designated by the Federal government under its homelessness program, Reaching Home, which the City of Toronto administers. In these capacities, TAEH collaborates with the City in planning and administering solutions to homelessness. City staff representatives participate on our steering committee and working groups.

TAEH partner organizations are working with the City to address homelessness. Our partners operate emergency shelters, respite facilities, streets to homes and hostels to home programs, with follow-up supports, supportive housing. They offer a range of specialized programs for specific populations. Our partner organizations include all the major supportive housing providers in Toronto that serve people experiencing chronic or

episodic homelessness, and related mental health and addiction issues. They include providers funded by the Provincial government and by the City.

## A. Realizing the Right to Housing

### Making human rights the foundation for *HousingTO*

Today, Toronto is poised to make human rights the foundation of its housing strategy. In her address to the Planning & Housing Committee on April 30, 2019, UN Special Rapporteur Leilani Farha offered an inspiring vision of the right to housing in action. City Council then asked the Director of the Affordable Housing Office, as part of the public consultations on Toronto's housing plan, to include a "rights-based approach" to housing in policy areas that fall within the City's jurisdiction. And most encouraging of all, on June 21st 2019 the Federal government enacted the National Housing Strategy Act, declaring that the housing policy of the Government of Canada is to "further the progressive realization of the right to adequate housing as recognized in the International Covenant on Economic, Social and Cultural Rights."<sup>1</sup>

People experiencing homelessness are at the greatest risk and have the most affordable housing challenges. Lack of vacancies, low housing supply, and high rent are just some of the barriers preventing access to deeply affordable housing. With its new 10-year Housing Plan, the City has an opportunity to implement policies that will truly make an impact and change the course of housing, including deeply affordable housing for those who need it the most.

The Right2Housing TO campaign, developed by a group of housing advocates and non-profit providers, drawing on the National Housing Strategy, has outlined the human rights principles that should underpin Toronto's housing policies, and has recommended the key elements that should be part of the *HousingTO* 2020 - 2030 Plan. We support these recommendations and the four principles: **non-discrimination, inclusion, participation and accountability**.

Our submission interweaves these principles throughout, and identifies actions that uphold them and make the changes necessary to take us collectively forward in realizing the right to housing.

Our advice in relation to human rights in this section draws as well from the TAEH Human Rights Working Group<sup>2</sup> and from the input of allied organizations, including people with lived experience participating in HomeComing's May 2018 forum, "What would Toronto look like if housing really was a human right?"

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<sup>1</sup> Bill C-97 (Third Reading), Division 19:313, June 6, 2019. <https://www.parl.ca/DocumentViewer/en/42-1/bill/C-97/third-reading#ID0EW3MO>

<sup>2</sup> The Toronto Alliance to End Homelessness' Human Rights Working Group was founded in January 2019 to continue the work begun 17 years ago by the HomeComing Coalition -- a human rights organization that supports inclusive communities where everyone belongs.

## **End discriminatory practices**

Once housing is understood as a human right, immediate action must be taken to address discriminatory practices. This includes those that are barriers to access to housing, those that stop development and those that cause eviction.

### **1.1 Review the Official Plan and zoning by-laws to:**

- Remove provisions that exclude rooming houses in the *majority* of Toronto's residential zones: including Scarborough, East York and North York in their entirety and much of Etobicoke. These restrictions have not prevented the proliferation of rooming houses in these areas. But they have prevented the people who live in rooming houses -- principally members of equity-seeking groups protected by the Ontario Human Rights Code -- from obtaining the same protections available to other tenants simply because any complaint about poor living conditions could lead to the loss of their homes.
- Remove residential uses defined by who lives there. "People with disabilities," "people who need support," "students" or "seniors" are not land uses. The use is "residential."
- Remove restrictions on lot sizes or unit sizes that effectively exclude people with low incomes.

**1.2 Ensure those who implement the Official Plan and zoning by-laws understand the human rights principles that underpin it. Training and supports must be available to ensure** front-line planning staff, and others, offer correct information to owners or developers of homes for people with disabilities. The Local Planning Appeal Tribunal (LPAT) or Committee of Adjustment should receive human rights training as part of their orientation and ongoing professional development to avoid making decisions based on obsolete assumptions about distancing requirements. All planning decision-makers should be trained to recognize a human rights issue when they see it.

**1.3 Redress discriminatory property tax rates.** In Toronto, tenants pay property taxes through their rent at a rate that is 2.28 times higher than the rate for home-owners. We recommend accelerating the City's very gradual approach to reducing this disparity.

**1.4 End discriminatory public consultation practices,** such as requiring additional public meetings, or changing the planning process, because the prospective residents belong to Code-identified groups.

**1.5 Review all municipal practices,** particularly licensing and code enforcement, to ensure they do not make low-income or vulnerable tenants homeless. Today, many tenants are afraid to report by-law infractions to the City for fear their rooming houses will be shut down, or the renovation of their apartments will make their homes unaffordable.

**1.6 Extend the recent Official Plan Amendment protecting dwelling rooms** in the old City of Toronto to all parts of the city.

## Promote participation

Next, working within the framework of housing as a human right, *HousingTO* must promote participation of those whose rights are currently most abrogated. In Toronto today, these are the people experiencing homelessness.

**2.1 Deliberately engage people with lived experience of homelessness or precarious housing** in the development of housing and housing-related policies. Ensure tenants as well as homeowners are represented in local decision-making.

**2.2 Promote engagement at all levels** – not just the housing file – by increasing participation in municipal elections and supporting neighbourhood organizations that give voice to low-income people.

## B. Access to affordable supply

Substantially everyone experiencing homelessness has an affordability problem – an affordability problem that results from both inadequate income support and unaffordability of what supply is available or being created, and the interplay between these two sides of the affordability coin.

Therefore, any strategy to address homelessness must also include an affordability strategy, one that both uses rent supplements and other income support tools on one side and increases access to places where people in receipt of income support may live.

We know from the flow through Toronto's emergency homelessness shelters, as well as research from many jurisdictions, that many, if not most people experiencing homelessness can be assisted to exit homelessness only with income support and at most transitional support. The recommendations in this section speak to what the City can do to end these people's homelessness.

They also demand action as ways the City can **promote inclusion** in housing, which is another of the core four principles of housing as a human right as noted above.

Our next section on supportive housing focuses on specific recommendations to assist those experiencing chronic homelessness that also need long term and/or more intensive supports to find and maintain stable housing.

**3.1 Develop an ambitious Inclusionary Zoning strategy.** We recognize the constraints imposed by the Ontario Government and the necessity to "make the numbers work." Nonetheless, we encourage the city to make the case to the citizens of Toronto for the Inclusionary Zoning strategy Toronto needs. It would feature:

- IZ in all areas of the City at levels appropriate to the local market, including as high as 30% in downtown.
- Perpetual affordability.
- Application to the entire building, not merely the uplift secured through a rezoning.
- Transferring inclusionary units in private developments to ownership by non-profit providers that will arrange support services for residents in need.

- Rent supplements for people experiencing homelessness to ensure access to units.

**3.2 Permit homes for a variety of income levels and household types in all residential neighbourhoods.** Permit and facilitate the development of shared houses of all types (rooming houses, co-housing), tiny houses, laneway houses, granny flats, duplexes, triplexes, townhouses and small apartment buildings in neighbourhoods now restricted to single detached houses. Include supportive housing in all neighbourhoods. Steps like these, to increase the supply of diverse housing forms and moderate prices in all neighbourhoods, can help reduce the pressure of high costs and limited housing options for people with low incomes and disabilities.

**3.3. Ensure affordable housing stays affordable in the long term.** Make affordable housing the priority use for city-owned lands. Prioritize non-profit or co-op developers who will ensure permanent affordability and, as they are mission driven, are more likely to facilitate the inclusion of marginalized and vulnerable tenants within the community. Complement Federal affordable housing programs by fast-tracking approvals and waiving development charges and fees. Target housing benefits to deepen affordability in non-profit owned buildings.

## **C. Supportive housing – the solution to homelessness**

### **Why supportive housing**

TAEH urges the City of Toronto to make supportive housing one of the main priorities in *HousingTO*. While housing needs are rising for many Toronto residents, people who are homeless face the worst problems. While recognizing that *HousingTO* must address a broad range of needs, severe needs call for priority attention.

This emphasis fits with a human rights approach. Disadvantaged groups are over-represented among the homeless population, and will benefit most from actions to advance the right to housing.

Supportive housing is a proven long-term solution. For people experiencing chronic or episodic homelessness, or living with serious mental health issues or addictions, it is a way to a stable home. It is a foundation for integration in the community, well-being, recovery, and better health. The effectiveness of supportive housing as solution to homelessness is shown by research evidence and by long experience in Toronto. The challenge today is to expand this successful response to meet the larger scale of unmet needs.

### **Severe and rising needs**

More and more Toronto residents are experiencing homelessness, and many need supportive housing. Average shelter usage has risen sharply since 2015; the 2018 Street Needs Assessment showed that almost half (48%) of people counted reported being homeless for at least six months, and over one-third (36%) for over a year.



The Access Point waiting list for mental health and addictions supportive housing has risen rapidly with currently over 15,000 applicants waiting for supportive housing (May 2019). With 60 percent of applicants already waiting two or more years and about one-third of them homeless, potential demand for programs to house homeless people far exceeds the amount of short-term follow-up support and housing allowances available.

### **The City's role in supportive housing**

The City has an important role in supportive housing – in partnership with the Federal and Provincial governments, and with community-based providers.

- The City funds about 1,600 Alternative supportive housing units managed by organizations with mandates to house people who have experienced homelessness or are at high risk
- Toronto Community Housing is home to many people who have faced homelessness or mental health issues – through waiting list priorities and arrangements with community support agencies
- Through Streets to Homes, Home for Good, and related programs, the City works with community providers to move homeless people into housing, with short-term rent subsidies and supports.
- In programs for new affordable housing, jointly funded by all levels of government and administered by the City, up to one-fifth of new units since 2000 have been supportive housing.
- The City oversees and jointly funds Habitat Services and through it, private sector boarding homes. This ensures adequate physical and personal care standards are maintained in supportive housing settings for over 900 people with mental health issues.

### **What is supportive housing?**

Supportive housing combines affordable housing with support services, enabling people with high needs to maintain stable housing. Our use of this term includes diverse ways of providing affordable rents, priority access, stable tenure, and suitable support services. It includes dedicated non-profit supportive housing and scattered units with rent supplement; it includes diverse types of support appropriate to individual needs.

### **New resources and opportunities**

Some additional resources that can help meet supportive housing needs are now available or soon will be.

- The National Housing Strategy (NHS) offers some extra Federal funding to create new affordable housing, via the National Housing Co-investment Fund.
- A new Canada-Ontario Housing Benefit program will be initiated under the NHS, providing portable rent subsidies to a significant number of people in need.
- The Canada-Ontario funding agreement (January 2019) on Home and Community Care and Mental Health and Addictions Services brings an extra \$44 million funding annually (Ontario-wide) starting in 2020, for community-based mental health services explicitly including supportive housing.
- Funding from the Ministry of Health and Long Term Care support for community mental health and addiction services, supportive housing, justice services and acute mental health inpatient beds

- The City, through its Housing Now initiative, has increased its contributions of land for new affordable housing, and has made related efforts to work with community-based housing providers.
- The escalating City subsidy for existing social housing has now stabilized thanks to secure Federal cost-sharing and new repair funding under the NHS, and rapid expiry of old project mortgages. This gives the City more options on how to use its \$400 million annual subsidy dollars to meet rising needs.
- More non-profit housing sites, including supportive housing, are now mortgage-free or soon will be. This resource of land and associated operating dollars can help create more supportive housing.
- The Ontario government has announced multi-year funding for the programs the City utilizes to provide short-term housing allowances and follow-up supports for people leaving homelessness.
- City Council recently passed a motion to develop a modular housing pilot that would see public properties appropriated for the development of modular supportive housing on an accelerated basis. TAEH would work with the Housing Secretariat in a consulting role on the implementation of the pilot.
- The City's Planning and Housing Committee announced its plans to expand the Housing Allowance Program and how new Federal/ Provincial funding can be invested to alleviate chronic homelessness. Over the next three years (2019-2022) the new Ontario Priorities Housing Initiative (OPHI) can provide 100 new households a month with a housing allowance, beginning this summer. In total, some 3,200 people experiencing homelessness will be supported through this initiative. TAEH will be working with the Housing Secretariat on implementing the program
- At the urging of community voices, City Council in January 2019 adopted an aspirational target of 18,000 more supportive housing units over the next decade.

## **Supportive Housing Goals for HousingTO**

TAEH recommends that *HousingTO* include the following goals and approaches for homelessness and supportive housing.

The recommendations below incorporate those in a report submitted in April 2019 by the TAEH Development Working Group<sup>3</sup> titled "Developing Supportive Housing in Toronto: Experiences, Challenges and Ideas".

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<sup>3</sup> The TAEH Development Working Group is a working group of primarily non-profit, alternative and supportive housing providers who collectively have experience and expertise in non-profit housing development and management.

#### **4.1 Embed ZERO TO goals to end chronic homelessness in Toronto (Built For Zero model)**

ZERO TO is the Alliance's campaign to end chronic homelessness in our city. It is based on work being done internationally along the Built For Zero model – a set of practices and tools that support communities in redesigning their local systems to achieve and then maintain zero chronic homelessness. Our campaign builds on the many successful work, programs, and approaches already underway in different areas.

In order to do this, we are mobilizing a collective approach to get to one coordinated system that works to achieve and maintain *Functional Zero* chronic and episodic homelessness in Toronto. *Functional Zero* is when we reach a state where we have more capacity in our housing and support system than we have people who are experiencing homelessness.

We do this through Coordinated Access, a consistent approach to assessing, prioritizing and connecting people experiencing homelessness to housing and supports using data. Coordinated Access builds a foundation for evidence-based decisions and improves an understanding of who is homeless and what their needs are.

#### **4.2 Set specific achievable supportive housing targets**

TAEH commends the City of Toronto for adopting an aspirational target of 18,000 supportive housing units over a decade – an average 1,800 units added each a year.

The City also needs to adopt more specific targets that are achievable with resources likely to be available, or with a feasible and realistic expansion of those resources. It needs to identify steps to marshal the resources that will enable it to achieve higher targets.

#### **4.3 Set in motion more specific implementation**

*HousingTO* will necessarily be a broad plan, covering a wide range of affordable housing priorities and goals. Within the constrained time frame for preparing that plan in 2019, it is not possible to develop a detailed implementation plan for supportive housing.

But beyond goals and broad directions, *HousingTO* can take two big steps toward implementation. It should identify specific options for enhanced City resources for affordable and supportive housing. And it should immediately launch the preparation of a supportive housing growth/implementation plan.

While *HousingTO 2020-30* can increase its goals and means for affordable housing, the plan must also set stretch goals for each City department to develop their service plans to reach.

#### **How to reach supportive housing goals**

The City, working with community partners, must take various steps to reach its supportive housing goals. A more detailed strategic implementation plan will be required, to take ideas like these and weave them into a plan of action. This should include actions such as the following:

### **5.1 Quickly assess and match people to the services they need**

TAEH and the City are working with community partners and The Access Point on better ways to assess the needs of people experiencing chronic/episodic homelessness or mental health issues, and match them quickly to the housing and services they need. For example, a given person may benefit most from rapid access to housing, short-term case management, specialized mental health support, transitional supports, housing allowances, or long-term supportive housing.

### **5.2 Make better use of existing supportive housing resources**

While permanent, non-profit housing offers secure affordable housing and a stable community for many people, it also houses some tenants who are ready for more conventional non-profit housing or private rental – if rent subsidies and suitable flexible supports are made available. This would free up units for others who can benefit from dedicated supportive housing.

### **5.3 Combine City, Provincial, and Federal NHS resources**

New supportive non-profit housing requires a mix of capital (including land), rent subsidies, and support staff funding. These are available from a mix of City, Provincial and Federal programs. The City should develop arrangements with the Federal and Provincial governments to enable housing providers to access resources in a combined package – smoothing the path to create more housing.

The City must also work with providers to lease more private rental units for supportive housing clients, using a mix of rent subsidies and support dollars from Federal, Provincial and City sources. *HousingTO* has the opportunity to create a negotiated partnership process in order to implement and deliver these arrangements, thereby ensuring that that supportive housing is an ongoing and integrated part of the City's activity in new affordable rental development.

The City has worked actively in recent years with the regional health authorities (LHINs – Local Health Integration Networks). As these are replaced over the next couple of years by a new system of Ontario Health Teams, Ministry regional offices, and the Ontario Health super-agency, the City and TAEH should work actively with these new organizations to ensure that municipal and Provincial health resources are coordinated in the area of supportive housing and homelessness; and coordinated from the person's, or client's, point of view.

### **5.4 Enhance supportive housing development capacity**

Toronto's supportive and Alternative housing providers have successfully built some 3,800 units of supportive housing, as well as supporting clients in 2,100 private rental units. To significantly expand the sector, higher capacity is needed. Providers need more in-house expertise and more ability to pay consultants, to carry out the extensive architectural, real estate, environmental, legal, project management, and other professional roles involved in developing new housing.

This capacity-building requires City support and should include strategies such as:

- Replacing the annual RFP for proponents seeking exemptions from fees, charges and taxes (but not land or direct funding) with an ongoing system of delegated administrative approval to qualified non-profit applicants. For example, in Ottawa verification of non-profit or charitable status is sufficient to access relief from charges and fees for affordable housing developments.
- Conducting two-stage proposal calls for supportive providers, to avoid a need for them to compete with “shovel-ready” private developers, and to reduce the burden of providers preparing costly competitive proposals for limited funding.
- Building on the Parkdale Rooming House Acquisition Pilot, the City should establish a City-wide funding program to facilitate acquisition of existing affordable rental housing by non-profits.
- Enhance providers’ in-house expertise and ability to pay architectural, environmental, real estate, legal, etc. services to develop housing — through the City’s new Non-profit Housing Capacity Fund, and by facilitating access to the new Federal Community Housing Transformation Centre.

### **5.5 Smooth the path of land use**

A City of Toronto priority for supportive housing must include steps to expedite land use and regulatory approvals for supportive housing development. TAEH has recently documented the recent problems faced by supportive housing applicants in its report “Developing Supportive Housing in Toronto: Experiences, Challenges and Ideas” – including long queues of development applications, delays due to zoning by-laws and lack of internal City trouble-shooting.

An effective City priority for new supportive housing should include actively facilitating City approvals. The City can offer supportive housing proponents flexibility on flexibility on density, unit sizes, parking and other requirements that it does not offer to private-sector proponents offering market housing. A new navigator and trouble-shooting function in the City Planning division will have staff who can work with colleagues to resolve challenges and delays in supportive housing applications, and accelerate the approval of supportive nonprofit developments.

### **5.6 Include supportive housing in City sites developed for affordable housing**

Housing Now has initiated a stronger City policy of providing land for housing. Every site the City develops for affordable housing must also include some supportive units. Depending on the particular site, this can take the form of entire small sites, supportive housing on part of a larger site, or scattered units or floors in larger buildings (conveyed or sometimes leased to supportive providers and combined, when appropriate, with Ministry of Health rent supplements). Preference for for-profit developers that partner with supportive housing owners and operators must be explored.

### **5.7 Obtain supportive housing units through inclusionary zoning**

Inclusionary zoning can be a cost-effective and rapid way to develop more supportive housing, while ensuring community integration. Units in private developments can be transferred to ownership by non-profit providers which will arrange support services for residents in need.

## **5.8 Enhance City Resources for supportive housing**

Implementing a higher City priority for supportive housing requires more City resources. These may include capital, land, rent subsidies, and support funding – areas where the City has been active over the years alongside its Federal and Provincial partners. While Federal and Provincial governments bear the primary responsibility and have the largest resources, a strong City priority for supportive housing is only possible with enhanced City resources.

These additional resources will make it possible for the City to provide the deeply affordable units that supportive housing tenants need. They will make it feasible for the City to adopt and implement tiered definitions of affordability that give priority to people who need rents well below average market levels,

## **5.9 Commit All City Divisions to Facilitating Supportive Housing Development**

The City has embraced an “all of government approach” to creating affordable housing through its new Housing and Planning Committee, and Housing Now initiative. To enable the City to meet its annual target of 1,800 new supportive housing units, we need the City to take a similar approach:

- Recognize the creation of perpetually affordable housing — accessible to people on OW and ODSP who need support — as a City priority in all City divisions.
- Ensure delivery targets for new supportive housing are included in the Toronto Housing Plan 2020-2030.
- Commit capital funding and rent supplements in the City budget for new supportive housing.
- Make supportive housing a priority for all city-owned sites
- Consider an “official trouble-shooter” position to advance supportive housing.

## **Bridging to action on supportive housing**

The *HousingTO* plan adopted by Council should include a bridge to action plans in particular areas, which would be developed in 2019-2020, building on the approaches suggested in this submission.

TAEH has initiated discussions with other organizations about developing a Supportive Housing Growth Plan for Toronto. This community-initiated plan includes an assessment of needs; specific priorities and targets with rationales; an analysis of existing and potential additional resources; and proposed action steps.

It is up to the City, in partnership with community-based providers, to create the recipe to add more supportive housing in Toronto. It is up to the City to plan how to combine Federal, Provincial, City, and other resources most effectively to this end. *HousingTO* provides an opportunity for the City to take steps to do this.

A community-initiated plan, under the auspices of TAEH will play an important role. It will be developed with active involvement of City staff and City political leaders. It will speak to the Federal and Provincial governments about Toronto’s needs, in a voice that is distinct from ongoing intergovernmental dialogue. A clear, evidence-based plan constitutes a strong basis for seeking stronger Federal and Provincial support.

A City of Toronto implementation plan on supportive housing is also needed. It would be anchored in broader *HousingTO* goals and priorities, would dovetail with the Supportive Housing Growth Plan, and would focus on City action along the lines identified in this submission.

## **D. Ensure accountability**

While Accountability is one of the core four principles for action on the right to housing, the TAEH encourages strong accountability for the implementation, monitoring, reporting and delivery of all of Housing TO.

**6.1 Require an "all of government" commitment to the success of the *Housing TO* plan.** We are encouraged that *HousingTO* 2020-2030 is a corporate-wide, all-of-government plan, and are pleased that City Council formed Toronto's Housing Secretariat to develop and co-ordinate the *HousingTO* 2020-2030 plan and its implementation across all City departments.

To support the Secretariat in doing so, *HousingTO* must require implementation and action plans with targets and timelines across the City's multiple divisions and agencies. These include, but are not limited to, Shelter, Support and Housing Administration, but also City Planning, Municipal Licensing and Standards, CreateTO, Real Estate Services, Social Development, Toronto Employment and Social Services, Seniors Service and Long-Term Care, Toronto Public Health, Fire Services, and Legal Department.

Finally, *HousingTO* must also ensure that its all-of-government mandate include the creation of affordable housing – accessible to people on Ontario Works and the Ontario Disability Support Program – as a City priority in all its departments, divisions, and agencies.

**6.2 Ensure the *HousingTO* plan really is a plan.** Many strategies are filled with good ideas, but they are not plans. To ensure the many ideas yielded by the over 60 *HousingTO* consultation sessions come to fruition, we need a plan that:

- Focuses on what the City can achieve on its own.
- Does not depend primarily on requests to the Federal or Provincial governments.
- Includes multi-year cost estimates to achieve each of the plan's targets. These estimates will be used to inform the City's annual capital and operating budgets.
- Establishes the steps required each year to achieve the targets, identify the positions (e.g. the Chief Planner, the General Manager of SSHA) that will be accountable for leading each step and makes their progress a factor in their performance review.
- Establishes an annual report card measuring progress on each target.
- Collects and publishes data on key indicators of affordability in the city (e.g. income and housing cost data). Anticipates the need to re-set the plan as new ideas and new challenges emerge. Missing a target is not a failure if it leads to a new path to success.

**6.3 Strengthen Toronto's Housing Charter** to make explicit the City's commitment to move, over time, to ensuring the right to housing for every resident, with priority to those who are homeless or most at risk of homelessness.

#### **6.4 Recognize the Mayor and City Manager as the leaders of the *HousingTO* plan.**

When we ask representatives from other jurisdictions the secret to their City's housing success, we invariably hear, "It was the leadership of our Mayor and City Manager." The plan should explicitly recognize the role of these office-holders to not only be the plan's champions, but also to be personally accountable for its success.

#### **6.5 Bring all housing decisions under the umbrella of a single Council Committee.**

Today, the most important housing decisions are divided between the Planning and Housing Committee and Economic and Community Development. Our first preference would be a dedicated standing Housing Committee as planned prior to the 2018 election, and failing that, to unite all housing and homelessness decisions under the jurisdiction of the Planning and Housing Committee.

#### **6.6 Consider establishing a Toronto Housing Advocate and a Toronto Housing Council, similar in function to the National Housing Advocate and Housing Council.**

The Toronto Housing Advocate would measure Toronto's progress in meeting its own housing and homelessness targets and hold it accountable for redressing systemic discrimination or exclusion. This mandate would differ from the role of the Toronto Ombudsman, whose mandate is focused on investigating complaints on matters of fairness across all City services.

The Toronto Housing Council would advise and collaborate with the Housing Advocate. It would build on the work of the *HousingTO*'s External Advisory Committee to monitor all City actions relevant to the *HousingTO* 10-year plan. In particular, we see this Housing Council as an opportunity to broaden inclusion of under-represented groups both through links to existing groups – such as the Dream Team, ACORN, the Federation of Metro Tenant Associations, and Voices of Scarborough -- and through specific outreach to people with lived experience who are not members of any organization and are rarely asked to comment on housing policy. The Toronto Housing Council would also be an opportunity to equip and support people with lived experience to serve on the National Housing Council.

#### **Conclusion**

*HousingTO* is an exciting and timely opportunity to make significant progress in how Toronto thinks about and delivers housing in our city that works for everyone. The Housing Secretariat has done an excellent job in engaging across all the diverse communities, voices and interests in Toronto and we look forward in seeing the results.

We believe too that most of the input gathered will share a vision of a Toronto where homelessness is rare, brief and non-reoccurring – in other words, an end to chronic homelessness. People and organizations' reasons will be different, and their proposed solutions as well, but all will be looking to the City and *HousingTO* for the leadership needed to finally make progress, and by so doing, increase affordability and the realization of the human right to housing for all.

TAEH will be there at every step to work with the City and do our part to ensure a strong and successful *HousingTO*.



## **What would Toronto look like if housing *really* was a human right?**

HomeComing asked housing providers, advocates and people with lived experience, what housing rights look like in action. Here are some of their answers:

*“Affordable housing would be part of the basic infrastructure within all neighbourhoods, like hydro, clean water and parks.”*

*“No more “Three Cities.” “Healthier, more inclusive, neighbourhoods.”*

*“Human rights would not be over-ruled by property rights.” “Construction decisions would be made according to community need.”*

*“Housing would be seen as infrastructure and not as a financial asset – i.e. the difference between the TTC and a Dodge dealership.”*

*“There would be a place for everyone. No-one is considered hopeless or undeserving.”*

*“Homelessness would be seen as a systems failure, not a personal failure.”*

*“The word ‘homeless’ would be extinct.”*

*“No shelters.” “No-one sleeping on the street.” “No need for Out of the Cold, releasing volunteer energy for long-term versus stop-gap projects.”*

*“Freedom to leave an unsafe neighbourhood.” “Freedom to challenge landlords.” “No-one stays in an abusive relationship for fear of the housing alternatives.”*

*“Children would not be removed from the family home because their moms can’t find an affordable home.”*

*“Less despair. More hope.”*