



Fixing the Housing Affordability Crisis

Municipal Recommendations for Housing in Ontario

14 August 2019

The Association of Municipalities of Ontario (AMO) is a non-partisan, non-profit representing almost all of Ontario's 444 municipal governments. Working together, the municipal order of government can achieve shared goals and address common challenges.

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A Message from AMO President and Chair of AMO's Affordable Housing and Homelessness Task Force

Housing affordability is top of mind for people in Ontario.

Housing is in short supply. Home ownership is out of reach for many. Rents are too high relative to incomes and Ontario's homeless desperately need a roof over their heads. The lack of suitable affordable housing in Ontario is a significant problem that all orders of government must work together to address in partnership with the private, non-profit, and co-operative housing sectors.

The federal and provincial governments have recognized the severe housing challenges facing Ontario families and have come together recently with various strategies, plans, and funding programs to address the issue. While these initiatives are welcome, more must be done to meet the housing challenges faced by the people of this province. Despite recent measures, many of AMO's outstanding recommendations to address the housing supply and affordability crisis remain relevant.

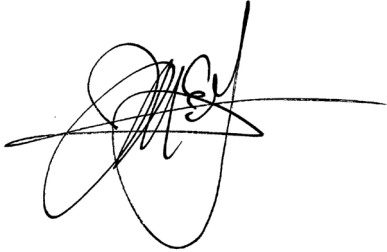
Finding solutions to address the housing crisis is a priority for AMO's Board and AMO's Affordable Housing and Homelessness Task Force. The task force is comprised of municipal elected officials and senior staff involved in housing from across Ontario. The task force also includes representatives from key organizations on the front lines of housing and homelessness prevention, namely the Ontario Municipal Social Services Association (OMSSA), the Northern Ontario Service Deliverers' Association (NOSDA), the Ontario Non-Profit Housing Association (ONPHA), and the Co-operative Housing Federation of Canada - Ontario Region (CHF-ON). Advice from the Housing Services Corporation (HSC) and the Ontario Federation of Indigenous Friendship Centres (OFIFC) also informs AMO's work on housing and homelessness issues. The task force has also benefited from regular collaboration with the Ministry of Municipal Affairs and Housing (MMAH) on housing and homelessness matters. Members of AMO's Planning Task Force also worked jointly with the Housing Task Force, especially on considerations to increase private market housing supply in Ontario.

This paper consolidates the numerous recommendations developed by the housing task force and approved by AMO's Board of Directors in recent years that have yet to be taken up the provincial government. They reflect perspectives from municipal governments and District Social Service Administration Boards (DSSABs) working on Ontario's front lines. Their timely implementation would realize efficiencies in Ontario's housing system and deliver real outcomes for Ontarians. The recommendations suggest actions by all orders of government, as well as housing developers, which would both preserve existing stock and expand the supply of affordable housing options. The recommendations also address homelessness.

Solutions to address the housing crisis are, and will continue to be, an AMO priority in the years ahead. The goal of this paper is to advance a conversation beyond the existing initiatives on how to comprehensively address the housing crisis in Ontario and support healthy and prosperous local communities.

We look forward to discussions with all housing partners. We must take advantage of the current opportunity to address these housing challenges.

Sincerely,

A handwritten signature in black ink, appearing to read 'J. McGarvey', with a long horizontal line extending to the right.

Jamie McGarvey
AMO President
Mayor of Parry Sound

Executive Summary

The housing and homelessness crisis in Ontario is serious and widespread, cutting across all four corners of the province and hitting everyone from the middle class to our most vulnerable residents. At its core, it reflects a shortage of affordable housing supply right across Ontario. Both the provincial government and the federal government have taken action through Ontario's release of the Community Housing Renewal Strategy and the Housing Supply Action Plan, and the federal government's National Housing Strategy. However, more needs to be done and municipal governments have a number of outstanding recommendations to help address the housing challenges facing Ontario families.

Municipal governments are on the front lines of a multi-faceted crisis. This crisis includes a lack of affordable homeownership and rent. Municipalities use local planning and financial tools to create responsible, appropriate, and affordable housing development that contributes to strong communities. They need flexibility and provincial support to bring more housing on stream more quickly, without compromising oversight and due diligence.

As well, there is aging, underfunded, and inadequate amounts of Community Housing to meet demand. Municipal governments struggle to deliver costly community housing, crushed by a backlog in capital repairs. Ontario is the only province in Canada where community housing is a municipal responsibility. This burden was never intended to be carried by the property tax base. It is critical to have a sustainable model for funding operations and capital repairs, including permanent and predictable funding for housing supports.

Chronic homelessness persists amidst a lack of supportive housing for people with complex health needs, including mental health and addictions. Municipal governments are primary providers of shelters and services for the homeless. The pressure on these services is worsened by the crisis in community housing. Many emergency shelters are at capacity and homelessness touches municipalities of all sizes, across all of Ontario. A more focused effort to address chronic homelessness is needed.

The federal and provincial governments have recognized the need for action and it is critical that all three orders of government work together to create more affordable housing that meets Ontarians' needs. The National Housing Strategy creates a platform for the federal, provincial, and municipal governments to come together to talk about how best to improve housing outcomes for the people of Ontario. The AMO-Ontario Memorandum of Understanding (MOU) Table should continue to help facilitate municipal-provincial discussions on the housing file. An all-of-government approach is needed.

This discussion paper consolidates AMO's existing housing and homelessness prevention policy positions that have yet to be taken up by the provincial government. The paper focuses on five key municipal priorities for housing in local communities:

- 1) increasing the supply of affordable market housing for families**
- 2) creating a financially sustainable model for community housing**
- 3) expanding affordable housing options**
- 4) ending homelessness; and**
- 5) supporting people with their health care needs for successful tenancies.**

Given the municipal role in housing, municipal governments and DSSABs are well positioned to provide advice on what is needed to address the housing affordability and supply crisis that is compromising quality of life for many and putting many others at risk. While the Housing Supply Action Plan makes some important steps, more needs to be done.

Shelter is one of the most fundamental human needs. AMO looks forward to continuing to work together with the federal and provincial governments, along with private developers and housing providers, to tackle the crisis and bring about comprehensive change for Ontarians.

Introduction

Too many people in Ontario struggle to find housing that makes sense for their needs and for their pocketbooks. Homeownership is increasingly out of reach, rental prices are skyrocketing, and our population is changing faster than the market can adapt to provide the right housing mix. This housing crisis is widespread and points to an affordable housing supply shortage across the province.

The construction of new housing infrastructure is not keeping pace with demand. This affects both people looking for housing and their communities. The access and availability of affordable stock directly relates to the ability to retain and attract workers into the labour force. As well, there is an economic return on investment, as housing development creates jobs in construction and other sectors.

Existing community (i.e. social) housing also faces significant sustainability challenges.¹ Many emergency shelters are at capacity and homelessness is prevalent in municipalities of all shapes, sizes, and geographies. The goal of eliminating chronic homelessness across Ontario is becoming harder to achieve.

Conditions in the private housing market make challenges in community housing and homelessness prevention even worse. Unable to find affordable housing on their own, many people turn to community housing to find shelter. What they find is a long waitlist. In some parts of the province the waitlist is growing at an unprecedented speed. Meanwhile, some community housing units sit empty because they are in a state of disrepair. Across the province, people are couch surfing and sleeping in abandoned barns and tents throughout the cold winter months. Our population is also aging with increasingly complex health needs, including mental health, addictions, and trauma-related needs. There are not enough supportive housing units to address demand and housing people in need of support with private landlords can be challenging.

The housing affordability and supply challenges facing Ontario are real and pressing. Both the federal and provincial governments recognized this with the release of recent plans and strategies. This includes the provincial Community Housing Renewal Strategy and Housing Supply Action Plan, and the National Housing Strategy. For these initiatives to succeed, all orders of government must work together to advance transformational change. An “all-of-government” approach to the housing crisis must also involve meaningful partnerships with the private and community sectors. Government cannot do it alone.

This discussion paper moves the conversation on housing solutions forward by consolidating AMO’s outstanding housing and homelessness prevention related policy positions that have yet to be taken up by other orders of government. If implemented, these recommendations can bring about meaningful change while complementing existing provincial and federal initiatives.

¹ Social housing is now referred to as Community Housing by the Province of Ontario. This paper reflects this change in terminology.

The paper begins by outlining principles to guide an all-of-government response to the housing crisis. It then provides a breakdown of roles and jurisdiction in housing and finishes by proposing action items for consideration by each order of government and housing developers. The paper focuses on five key municipal priorities for housing in local communities:

- 1) increasing the supply of affordable market housing for families**
- 2) creating a financially sustainable model for community housing**
- 3) expanding affordable housing options**
- 4) ending homelessness; and**
- 5) supporting people with their health care needs for successful tenancies.**

We have a unique opportunity to collectively identify and implement affordable and community-based housing solutions for Ontarians. All three orders of government are at the table. As local front line leaders, municipal governments have their sleeves rolled up and are ready to continue the work.

Principles to Guide an All-of-Government Approach

A principled approach is necessary to identify meaningful housing solutions that work for all Ontario families. AMO puts forward the following principles to guide an all-of-government approach to housing in Ontario:

1. All orders of government should work together to ensure that the people of Ontario have access to safe, suitable, and affordable housing options. They should dedicate adequate resources to the full range of housing, including homeless shelters, community housing, supportive housing, rental housing, and home ownership. Special attention should be paid to housing solutions for those most in need and for middle-income households.
2. All orders of government should foster 'complete communities' with a diverse range and mix of housing options, densities, and tenures developed through sound planning processes.
3. Municipal governments and District Social Service Administration Boards are closest to the people and best positioned to plan and manage housing and homelessness prevention services in their communities. Municipal autonomy is necessary to protect the public interest and meet local needs.
4. Where municipal governments are the primary funders of services in Ontario, they should be the principal policy maker, with input from local communities and housing stakeholders. Provincial legislation, regulations, and policies should give flexibility to meet local needs rather than direct how services are to be delivered. Municipal Service System Managers should be treated as equal partners to co-design housing and homelessness prevention systems in Ontario.
5. Housing and homelessness prevention programs are essentially a means for income redistribution. As such, they should not be funded primarily through property tax revenue. It is unsustainable and at odds with basic principles of good public and fiscal policy.
6. All orders of government should work in partnership with Indigenous communities to advance co-developed, Indigenous-driven housing solutions that meet the needs of Indigenous people.

Roles and Jurisdiction in Housing

Each order of government has a role to play in addressing the housing supply and affordability crisis. Municipal governments as local planning authorities and service system managers; the Province as a steward of the land use planning and community housing systems; and, the federal government as a system enabler.

The federal and provincial governments also play a role in funding and in the development of frameworks to implement housing approaches. When it comes to strategizing and implementing solutions on the ground, the federal and provincial governments should defer to the expertise of municipal governments and service system managers on the front lines.

Ontario's Municipal Order of Government

Housing pressures are most keenly felt as a local issue. As the order of government closest to the people, municipal governments and District Social Service Administration Boards (DSSABs) do the heavy lifting in tackling the crisis on the ground.

The municipal interest in housing can be broken down into two general categories. On one hand, municipal governments are responsible for local planning and the implementation of the Ontario Building Code. Municipal governments also pride themselves in being stewards of complete communities that provide a wide range of housing options for residents. Complete communities are places where homes, jobs, schools, community services, parks, and recreation facilities are easily accessible.¹ A well-designed built environment also promotes resident quality of life and population health.

On the other hand, some municipal governments administer the community housing system locally. Ontario's 47 Consolidated Municipal Service System Managers (CMSMs) and DSSABs co-fund, manage, plan, and administer community housing. They also develop affordable housing stock and deliver homelessness prevention programs. Collectively, the 47 are known as Service System Managers.² CMSMs are upper tier (i.e. county, region) and single-tier governments located in southern Ontario, except for Sudbury in the north which is also a CMSM. DSSABs perform the function of service system manager for social services in northern Ontario, including for housing and homelessness prevention services.

Ontario is the only Canadian province or territory where municipal governments are responsible for the funding and delivery of community housing. In 2017, property taxpayers contributed over \$1.77 billion towards community housing.² This significant investment by municipal governments is a result of the provincial downloading of community housing to service system managers in 2001 – 2002. This amount is just for community housing. It does

² According to Ontario's Housing Policy Statement: "Service Managers occupy a unique position as system managers and service providers in the areas of housing assistance, homelessness prevention and support services, income support programs, early learning and child care services. There are also opportunities for Service Managers to work with other related service systems - such as health, community services, children and youth, child welfare, corrections - to enable people to access the housing and supports that they need. The province is promoting coordination efforts across service systems to help maintain housing stability, prevent homelessness and improve outcomes for people."

not include the full range of spending by municipal governments for housing-related supports, homelessness prevention programs, or financial incentives that they provide to facilitate affordable housing development. Due to limitations in provincial data collection, a figure representing the full picture is challenging to pull together.

Service system managers work in partnership with co-operative, non-profit, and Indigenous community housing providers. They also consult with community members to address the housing needs of vulnerable, low-income Ontarians. The *Housing Services Act, 2011* requires service system managers to develop ten-year housing and homelessness plans. These plans are based on local needs and guide local actions to address homelessness and housing in line with provincial and local priorities. The Act also sets service level standards such as the minimum level of assistance that must be provided by service system managers. Eligibility for rent-geared-to-income (RGI) assistance is also legislated by the Act and its regulations. As well, municipal governments provide housing benefits and rent supplements.

All municipal governments, regardless of whether or not they are designated Service System Managers, play a critical role in facilitating affordable housing. They have several planning and financial tools at their disposal. For example, municipalities can implement community improvement plans, waive or defer development charges, and designate housing providers as municipal capital facilities to provide financial assistance. Many do so to the extent that fiscal circumstances allow and community priorities dictate. It works best where there is close collaboration between service system managers and other municipalities to achieve mutual goals.³

The Government of Ontario

The Government of Ontario has a multifaceted role to play in the search for 'made in Ontario' housing solutions. More recently, it has taken a keen focus in addressing the housing crisis with the release of its Housing Supply Action Plan and related legislation.

[*More Homes, More Choices: Ontario's Housing Supply Action Plan*](#) aims to make it easier to build new housing, and suggests changes to planning, heritage, environmental assessments, endangered species, and conservation-related policy. As well, the Action Plan promises to help renters by making it easier to build new rental properties and to develop secondary suites in existing homes. Many of these provincial proposals have already been addressed with the royal assent of [*Bill 108, the More Homes, More Choices Act, 2019*](#).

On the planning front, the Province regulates the municipal planning function through legislation like the *Planning Act*. It is also responsible for numerous provincial directives including the Provincial Policy Statement (PPS), the Greenbelt Plan, and various regional growth plans. This overarching planning framework sets requirements for municipal

³ For more information on what is in the municipal toolbox, see the guide "Municipal Tools for Affordable Housing" produced by the Ministry of Municipal Affairs and Housing on their website <http://www.mah.gov.on.ca/AssetFactory.aspx%3Fdid%3D9270>

planning activities, including notifications, public meetings, consultation with third parties, and timelines.

Ontario is also responsible for numerous processes that may affect timelines in the municipal development approval process. This includes the Local Planning Appeal Tribunal (LPAT), provincial environmental assessments, Ontario's land registry, and more. The Government of Ontario also provides citizen guides to help developers and homeowners navigate the land use planning process.

When it comes to community housing, the Ontario government is the steward of the housing system, creating legislation and establishing service requirements for Service System Managers. The Province regulates community housing through the *Housing Services Act, 2011* and sets guidelines for local Housing and Homelessness Plans through the [Ontario Policy Statement: Service Manager Housing and Homelessness Plans](#) and through various housing strategies. A new [Community Housing Renewal Strategy](#) was released by the provincial government in April 2019 to sustain, repair, and grow the community housing system.

Ontario also has several funding programs to help people find homes. Municipal governments and DSSABs manage service delivery through these provincial funding programs, including the Community Homelessness Prevention Initiative (CHPI), the Strong Communities Rent Supplement, Home for Good, the Canada-Ontario Community Housing Initiative (COCHI) and the Ontario Priorities Housing Initiative (OPHI). This is the successor program to the former Investment in Affordable Housing (IAH) program. Additionally, provincial programs provide funding to: support affordable housing construction; facilitate homeownership and renovations; advance homelessness prevention; increase access to low-cost financing; and, provide rent supplements and housing allowances, amongst other objectives. Some of these programs, like the OPHI and COCHI programs, are co-funded with the federal government. They all have specific mandates and targets with time-limited funding. The provincial government is also the primary funder of supportive housing in Ontario.

For more information on Ontario's housing programs and initiatives, see the MMAH [website](#).

The Federal Government

The federal government functions as a system enabler when it comes to housing policy and funding. Leveraging its fiscal capacity, Canada can help make community housing financially viable across the country, promote the expansion of more affordable housing options, and help prevent homelessness.

The first full federal community housing program in Ontario began in the 1950s. Many units were built under this federal leadership. From 1986 to 1992, the federal government's role in housing slowly diminished until funding for new community housing came to a complete halt in 1993. The federal government then transferred administrative responsibility for its community housing stock to the province through a 1999 agreement with Ontario. These

administrative functions were further passed on to municipal governments with the enactment of the *Social Housing Reform Act* in 2000.

In the years that followed, the federal government slowly began taking tentative steps towards reclaiming its prior role. It returned in force beginning in 2016 with consultations for a new National Housing Strategy. As part of the strategy, several remaining federal housing programs will be replaced by successor initiatives.

The National Housing Strategy announced in 2017 is a Canada-wide \$40 billion, 10-year plan. A bilateral agreement on the National Housing Strategy was signed between Canada and Ontario in 2018. Work is ongoing to finalize the design and implementation of the strategy in the Ontario context. Notably, a Trilateral Coordination Forum has been created with representatives from the federal, provincial, and municipal orders of government to advance the strategy in Ontario. Key highlights of the agreement are:

- investments of approximately \$4 billion over 9 years to protect, renew, and expand community housing — this funding will also support Ontario's priorities related to housing repair, construction, and affordability;
- a new Canada Housing Benefit in Ontario; and
- long-term, predictable funding to preserve existing community housing units beginning April 1, 2019.

Funding opportunities are also available outside of the bilateral agreement through the National Co-Investment Fund and other initiatives. Other federal housing supports include seed funding programs, funding to preserve community housing, support for innovative financing opportunities, various loan insurance programs, and other investments in affordable housing. In addition, the federal government is creating a Technical Resource Centre called the Community Housing Transformation Centre. The purpose of this Centre is to help community housing providers build capacity to become more effective and sustainable.

AMO is pleased to see federal-provincial co-operation under the National Housing Strategy and the willingness to work with service system managers. Both the provincial and municipal governments are providing significant funding to cost match the federal dollars and leverage investments in Ontario. The 2019 Ontario Budget confirmed the provincial investment in the strategy. It also indicated next steps in negotiating and co-designing the Canada-Ontario Housing Benefit with the Canada Mortgage and Housing Corporation (CMHC). This proposed housing benefit will help address housing affordability.

While the 2019 Federal Budget did not include further new investments for community housing, it did include initiatives targeting private market housing. This includes assistance for new home buyers and an increase in funding for new rental construction. The federal budget also includes funding to support urban Indigenous service providers. As well, the federal government introduced legislation that would require future governments to maintain an ongoing National Housing Strategy. This is significant. Some, nonetheless, feel the government is not going far enough to establish an enshrined right to housing.

For more information on the National Housing Strategy, see AMO's submission to the 2016 National Housing Strategy consultation process [here](#). Information on the strategy and

federal housing programs is also available from the [federal government](#) and from the [Canada Mortgage and Housing Corporation](#). The Canada-Ontario bilateral agreement can also be found on the CMHC [website](#).

Action Plan for an All-of-Government Approach

1) Increasing the Supply of Affordable Market Housing for Families

The cost of market housing — both homeownership and rental — is increasingly out of reach for everyday people. According to the CMHC, the cost of the average new single-detached home in Ontario was \$1,003,516 in February 2019. The median was around \$750,000.³ When resales are incorporated, the province-wide average for February 2019 was \$580,019.⁴

In the rental market, the average price of a three-bedroom apartment is around \$1,500.⁵ Prices are even higher in the GTHA for both home sales and rental prices. This impacts the overall figures for Ontario. Given relatively stagnant wage growth, the cost of homeownership, and high rents, it now takes potential buyers around 12 years to save for a down payment.⁶

The proportion of renters and homeowners in core housing need, defined as people paying more than 30% of their income on housing, is increasing. According to the 2016 census, Ontario was the province with the highest proportion of households in core housing need. This situation is not limited to one region or municipalities of a certain size. There are many different housing markets in the province, all with their unique needs.

Another key challenge relates to low vacancy rates and the amount of new rental stock entering the housing market. Across Ontario, the vacancy rate for rental housing is at a meagre 1.8%.⁷ This means that renters have limited options when it comes to upgrading to a new apartment or downsizing to save costs. New housing stock is also taking too long to get to market for a range of reasons, many of which are outside of municipal control. Estimates suggest that Ontario is already short 29,000 affordable rental homes. This means that 13,700 new rental homes must come online each year for the next ten years to accommodate population growth.⁸ Meanwhile, over 100,000 new proposed housing units across Ontario are waiting for development appeal proceedings due to an under-resourced Local Planning Appeal Tribunal (LPAT).⁹

The factors leading to an unaffordable housing market are complex. They include a combination of low vacancy rates, inadequate supply, high commodity and investment interests, but also modest employment and labour markets. Many buyers and renters do not make enough money to truly afford housing available on the market.

While housing affordability is a challenge province-wide, some problems are unique to Ontario's north and rural areas. Given stable or declining population levels, homeownership is relatively accessible in most of Northern Ontario. Rents are also 20-30% below the province-wide average. Instead, in the north, the key challenge is the state of existing housing. A short construction season and a limited supply of skilled trade workers mean that new housing is harder and more expensive to build. This means that families have no place

to move or ability to renovate when their existing homes become older and increasingly obsolete. For this reason, much of the housing stock needs to be renovated.¹⁰

Throughout the consultation on Ontario's Housing Supply Action Plan, AMO identified actions that all orders of government and developers could take to improve Ontario's housing supply and affordability. AMO emphasized that many delays in the planning approval process were due to incomplete applications, third-party reviews and provincial processes, and due to decision timelines. AMO also emphasized that growth should continue to pay for growth.

Bill 108, the *More Homes, More Choices Act, 2019* took several actions to advance the Province's Housing Supply Action Plan, including: reforming development charges for hard services; introducing a new community benefit charge framework for soft services; and, reforming the LPAT process. Changes were also made to shorten legislated planning approval timelines.

The government effort to find solutions to the problems at hand are laudable. However, there are still some details to be worked on to achieve key goals. Bill 108 received mixed reviews from [AMO](#) and municipal governments. Ontario's municipal governments are nonetheless committed to continuing to work with the province to advance housing in local communities. While there are positive elements, there are some areas of concern such as the return to *de novo* hearings at the LPAT and the potential limiting of municipal ability to recover the costs of growth and plan effectively for the good of their communities.

At the time of writing, several regulations related to the new community benefits framework and development charge reforms are open for public consultation on the regulatory registry. It is important that the finalized regulations reflect municipal input and do not have a negative fiscal impact on municipal governments. There is also an important consultation underway on changes to the Provincial Policy Statement, including measures to support housing development.

While AMO is pleased that the government is prioritizing housing supply with the release of the Housing Supply Action Plan, more needs to be done. All orders of government and the development community must strive for continuous improvement to address the housing supply and affordability crisis. In its initial submission to the Housing Supply Action Plan, AMO made numerous recommendations for all three orders of governments and developers to help address the issue. Many of these recommendations remain relevant now that Ontario's plan has been released. AMO appreciates that the provincial government has signalled that its work to increase housing supply will continue. Therefore, the following recommendations should be considered for the future. Ontario's municipal governments are on the front line and ready to work with all government and community partners to find and implement housing solutions that make sense for Ontario families.

While addressing market housing is important, it must be said that measures to improve market housing alone will not solve the housing crisis in Ontario. Co-ops and government-funded community housing also require attention. The private market is nonetheless a critical contributor with an important role to play.

✓ **Streamline to Speed up the Approval Process by Addressing Implementation Challenges**

Speed is an important factor in bringing new housing supply to market. One of the key measures introduced through Bill 108 was shortening the timelines for municipal governments to make planning decisions related to official plans from 210 to 120 days and from 150 days to 90 days for zoning by-law amendments. As well, plans of subdivision applications are now sheltered from third-party appeals.

When it comes to planning, municipal governments look for good processes and due diligence to safeguard the public interest, ensure local standards are met, and to make sure that communities are designed using sound planning principles. All involved parties can make changes that would speed up the development approval process. A key challenge for many municipal governments is that developers will submit incomplete or inadequate applications that are not detailed enough, causing delays in the planning approval process. Improving the quality of applications submitted to municipal governments would speed up approvals. As well, many delays in the planning process are due to delays in agency or provincial approval processes and requirements.

It is unclear how legislative changes related to the LPAT will speed up the construction of housing. Although Ontario has committed to increasing the number of LPAT adjudicators to clear the backlog, appeal proceeding timelines will likely increase in the near future once the LPAT returns to old *de novo* hearing rules.

The *Planning Act* had previously empowered municipal councils to make the decision on planning matters based on a test of the application's conformity to the municipality's official plan, provincial plans, and the Provincial Policy Statement. With the passing of Bill 108, adjudicators will rule based on what they perceive to be the best planning outcome. The reinstated rules also allow planning applicants to introduce new evidence during the hearing process not previously shared with the municipality in the initial application. Historically, drawn out *de novo* hearings have delayed construction. This raises concerns that the return to these rules will result in further delays. AMO urges the government to monitor and evaluate the impacts of these changes.

There remain a number of implementation challenges to speeding up new housing development. All parties involved, whether it be municipal governments, the provincial government or developers, can take steps to help. AMO understands that the government will continue its efforts to increase housing supply. The following recommendations are presented for further consideration by all.

Recommendation #1: That municipal governments continue to work to ensure that zoning by laws are up to date with official plans.

Recommendation #2: That municipal governments pursue and move towards e-permitting if they have the resources.

Recommendation #3: That municipal governments consider the benefit of third-party coordinating engineers as a potential option.

Recommendation #4: That municipal governments explore the benefits of offering one-window ‘concierge services’ to fast track priority proposals.

Recommendation #5: That municipal governments consider whether adopting a Community Planning Permit System would meet the needs of their local communities.

Recommendation #6: That municipal governments consider succession management strategies to ensure that they can continue to employ well-qualified building inspectors.

Recommendation #7: That the provincial government modernize notice provisions.

Recommendation #8: That the provincial government continue to document and disseminate Best Management Practices (BMPs) and provide data support to municipal governments to foster learning, resulting in continuous improvement.

Recommendation #9: That the provincial government provide support to housing developers including sharing of BMPs.

Recommendation #10: That the provincial government provide training to help municipal governments increase the supply of building inspectors.

Recommendation #11: That housing developers take steps to ensure they submit complete, quality applications to reduce timelines and reduce the number of resubmissions.

Recommendation #12: That housing developers take good care to prepare comprehensive site plans.

Recommendation #13: That housing developers diligently and completely fulfill contractual Clearing Conditions in a timely manner.

Recommendation #14: That housing developers ensure timely building inspections to keep projects on track and on schedule.

✓ **Promote a Mix of Housing and Missing Middle Housing**

AMO believes in fostering complete communities with a diverse range and mix of housing options, densities and tenures to meet needs as required by the PPS. This is essential if municipal governments are to meet affordability targets.

In many areas, there is a lack of what is known as ‘missing middle’ housing. This term means different things to different people. Generally, it refers to a missing range of middle density housing options. This is housing that can adapt to different lifestyles – such as

intergenerational living, new families, and seniors aging in place. This could include row houses, semi-detached homes, townhouses, or other options. For many, 'missing middle' housing can also refer to housing affordable to middle income earners.

In many cases, not enough housing for both families and seniors is being built near transit, schools, workplaces and amenities. For example, families need family-sized housing and rental accommodations. In other situations, over-housed seniors may need options to downsize their living accommodations and/or seek shared housing arrangements. Potential solutions to address these challenges require innovative thinking. Secondary suites, flex housing, and the construction of homes that can be easily outfitted with accessibility features later on should be part of the equation.

Municipal governments have a range of tools under provincial legislation to facilitate affordable housing development. One promising tool is inclusionary zoning as it requires a share of affordable housing in new developments. However, Bill 108 limits municipal governments' ability to effectively leverage this tool. Inclusionary zoning is now limited to protected major transit station and development permit system areas. This means that inclusionary zoning will not be possible in areas that lack major transit stations. There are also barriers to creating development permit systems that will limit the number of units built leveraging inclusionary zoning in these areas. Inclusionary zoning has been successful in other jurisdictions, primarily in the United States. It can help fill in the gap in 'missing middle' income housing if provincial rules allow it to be used in broader situations.

It is also important for all three orders of government to work together to increase the supply of rental units. The lack of new builds has had a negative impact on affordability in the rental market. Increasing the number of rentals will help maximize the mix of housing in Ontario's municipalities.

Recommendation #15: That the provincial government provide further information and promote awareness among municipal governments of their ability to enact inclusionary zoning by-laws, including on the new rules following the Royal Assent of Bill 108.

Recommendation #16: That municipal governments revisit zoning to explore zero-lot-line housing, tiny homes, laneway housing, flex housing, shared housing, and other types of housing that reduce land costs and increase density.

Recommendation #17: That the provincial government consider financial incentives for developers to encourage missing middle-type housing for moderate-income families.

Recommendation #18: That the provincial government support growth of new housing supply with corresponding investments in infrastructure including schools, hospitals, transit, and transportation.

Recommendation #19: That the provincial government work in partnership with municipal governments to change public attitudes opposed to

intensification by making the public more aware of the negative impact of sprawl on the environment, traffic congestion, and on the costs of municipal services.

Recommendation #20: That the provincial government ensure there is enough flexibility and supports for municipal governments to look at underused and strategically located employment lands for mixed-uses, including housing.

Recommendation #21: That developers consider a menu of finishes so that more modest options are available.

Recommendation #22: That developers consider the potential for expandable/reducible units (i.e. time-share units often have the option of combining adjoining units for larger floor plans or closing off access for small units).

Recommendation #23: That developers design buildings in a way that allows for the future installation of accessible features.

✓ **Support the Cost of New Housing Supply Through Existing Tools**

Some have pointed to municipally imposed charges and fees as contributing to the high cost of housing. However, fees like development charges are not the root cause of the housing supply and affordability crisis nor would reducing them solve the problem. Rather it will create new ones. Municipal governments and the Province must work together to dispel myths about development charges, property taxes, and user fees by promoting how they are critical to creating livable homes and communities.

Growth must pay for itself. Development charges are not a revenue source for municipal governments. Rather, they are cost recovery for expensive but necessary infrastructure to connect new builds to existing municipal services, including water, sewage, roads, and electricity. A house cannot be occupied without access to these vital municipal services. The infrastructure cannot pay for itself nor is it fair to increase neighbours' property taxes or reduce existing municipal services to finance expensive infrastructure for new developments.

Despite the importance of development charges as a cost recovery tool for municipal governments, the Province introduced reforms as part of Bill 108 against municipal advice. Now, only select municipal 'hard' services are eligible for development charges as a matter of legislation. As well, in many cases, development charges are payable over 6 years rather than being payable to the municipality up front. This increases administrative burden and cost for municipal governments. It was however positive that the province added in new expenses into the development charges calculation including paramedic services and waste diversion.

Bill 108 also introduced a new Community Benefits charge framework to replace height and density bonusing under Section 37 of the *Planning Act*. The Community Benefits charge

framework will create a mechanism for municipal governments to finance the development of soft services now ineligible for development charges. A risk for municipal governments is that these changes will impact the ability for growth to pay for growth. By listening to municipal advice, the Province can minimize negative impact as it develops regulations.

Recommendation #24: Municipal governments should continue to exercise the ability to voluntarily provide financial incentives when they are able, and at their sole discretion, to facilitate the targeted development of new affordable housing in line with local municipal objectives.

Recommendation #25: The provincial government should ensure development charges and community benefits charges are calculated in a way that ensures growth pays for growth.

Recommendation #26: The provincial government should consider allocating revenues generated from the land transfer tax and the non-resident speculation tax to affordable housing and for financial incentives to encourage housing solutions for moderate-income households.

For more information on development charges and their importance to the fiscal health of our municipal governments, click [here](#).

✓ **Explore Innovative Housing Solutions**

We must encourage innovative solutions to address the housing supply and affordability crisis. Promising practices from other jurisdictions in Canada and abroad should be identified and considered. Any innovative housing policy options identified through this exercise must balance the needs of communities while ensuring public safety.

Not in My Back Yardism (NIMBYism) often contributes to local opposition to new housing developments. NIMBYism can lead to delays in approval timelines and slow down the construction of new builds. There is a role for the Province to play to support municipal governments in gaining public acceptance for new housing developments. Public education can change the culture around NIMBYism and facilitate new developments.

Recommendation #27: That municipal governments continue to work with developers to encourage innovative housing while still conforming to the standards of the Ontario Building Code.

Recommendation #28: That the provincial government research and disseminate promising practices from other jurisdictions about how to facilitate innovative housing supply.

Recommendation #29: That the provincial and federal governments ensure that municipal governments continue to have the discretion to offer home ownership programs and renovation support programs with funding from

federal-provincial housing programs available under the National Housing Strategy.

Recommendation #30: That the provincial government explore and pilot new innovative home ownership programs with municipal governments for low- and moderate-income people, with a special focus on first-time homebuyers, including shared-equity schemes and rent-to-own approaches.

Recommendation #31: That the provincial government advocate to the federal government for more robust home ownership programs.

Recommendation #32: That the provincial government research and share promising practices to make better use of existing homes, buildings, and neighbourhoods to increase the supply of housing (e.g. matchmaker services that facilitate shared living arrangements between seniors in “over-housed” situations and renters, including students).

Recommendation #33: That the provincial government consider a “Yes in My Backyard” initiative to address NIMBYism and change public attitudes against new ‘missing middle’ and community housing developments.

✓ **Protecting Tenants while Balancing Landlord Rights**

Facilitating new rental housing that is safe, secure and suitable for renters requires special attention. There is a widespread shortage of rental housing in the province appropriate for low- and moderate-income people including seniors and families. Very few purpose-built rentals have been constructed in recent years. Changes in this area may benefit landlords by making it easier to create rental units and may help tenants by ensuring housing stability.

It is important to recognize that increasing the supply of rental housing will not necessarily increase affordability. Rents in new builds have been largely unaffordable for low-income households. Although there is a demand for affordable rental accommodations, there is a gap between what households can afford and the revenue that is required to support new rental development.

A balance must be struck between landlord and tenant rights and obligations to encourage new rental units and to preserve existing ones. With proper encouragement, secondary suites can also be part of the solution.

Recommendation #34: The provincial government should consider input from the public, including landlord and tenant organizations, to find the appropriate balance between landlord and tenant rights and obligations.

Recommendation #35: The provincial government should provide more public education to both landlords and tenants on their rights and obligations.

Recommendation #36: The provincial government should provide investments and incentives for purpose-built rental housing.

Recommendation #37: The provincial government should explore ways to speed up the landlord and tenant board process, including by addressing the adjudicator shortage.

Recommendation #38: The provincial government should promote awareness and provide information to municipal governments about ways to effectively facilitate legal second suites and new rentals in a manner that meets the needs of communities.

Recommendation #39: Municipal governments should exercise their ability under the *Planning Act* to facilitate the creation of legal second suites and new rentals in a manner that meets the needs of communities, conforms appropriately to municipal by-laws, and advances public safety.

Recommendation #40: The provincial government should provide low cost loans to homeowners who wish to renovate to create new legal second units in accordance with local municipal bylaws.

2) Creating a Financially Sustainable Model for Community Housing

The Auditor General's recent report on "Social and Affordable Housing" found that there were 185,000 households representing almost 481,000 people on the community housing waitlist.¹¹ The 2016 census results also indicate that 15.3% of Ontario households are in core housing need. This means that people are living in unsuitable, inadequate or unaffordable housing, and do not have access to better options in their community.¹² About 20% of Ontario's renters rely on community housing. This is a significant proportion.

In many cases, service system managers are struggling to afford providing community housing and to keep the existing stock in a good state of capital repair. The long-term fiscal sustainability challenges facing community housing must be addressed for service system managers to continue finding homes for low-income Ontario families. There is much that can be done to improve the flow of funding and to increase flexibility to get the job done more effectively. AMO is looking forward to the solutions proposed in the provincial Community Housing Renewal Strategy, released in 2019. The strategy responds to municipal asks. It is a good foundation. Still, AMO has further recommendations and AMO will continue to work collaboratively with MMAH to strengthen the community housing sector.

For more information about the provincial strategy, see the Ministry [website](#).

✓ **Review and Improve Funding Arrangements to Secure Permanent, Predictable Funding for Housing Supports**

Service System Managers face funding shortfalls when it comes to community housing. A number of challenges contribute to the fiscal pressure facing the community housing system including:

- the capital repair backlog;
- the end of operating agreements;
- uncertainty around the end of mortgages;
- the cost of creating and maintaining new and existing units;
- the phasing out of time-limited programs; and
- the cost of services for people who need additional supports.

To effectively plan over the long-term, service system managers require predictable funding sources for housing programs. While the National Housing Strategy commits funding over the period of a decade, service system managers plan on longer term horizons, over 20 to 30 years out.

Of immediate concern is the growing backlog of capital repairs in the community housing portfolio. Service system managers cannot address this backlog alone. Preserving community housing is important because much of the stock is 40 to 60 years old. Despite long waiting lists, some community-housing units are unoccupied because there is no funding for major capital repairs. The federal and provincial governments have the greatest fiscal capacity to fund the significant capital needs of community housing.

These problems date back to 2000 and 2001 when community housing was first downloaded to municipal governments by Ontario. This transfer of responsibility was done without a corresponding transfer of adequate financial reserves to address both current and future forecasted capital needs. Of all the community housing units in Ontario, 70 percent are estimated to have capital reserve shortfalls, with a total capital repair backlog amounting to an estimated \$1.5 billion as of 2016.¹³ This figure has likely risen in recent years due to an insufficient amount of dedicated federal and provincial funding. The Ontario Non-Profit Housing Association (ONPHA) estimates the figure could be as high as \$2.6 billion and that it would cost \$65 billion to fully replace all existing community housing units.^{14, 15}

Deferred maintenance must be dealt with to ensure that community housing remains viable. Maintaining the existing community housing portfolio is the most efficient and cost-effective way to immediately provide affordable housing to those in need. It is critical that units remain in good condition. A plan with enough funding from all orders of government will help ensure a sustainable supply of safe, adequate, and well-maintained community housing units. While federal and provincial funding under the National Housing Strategy will help with the situation, the problem exceeds the funding committed to Ontario. A good next step would see the three orders of government collaborate to fully identify the magnitude of the capital repair backlog. This will help determine what is needed to address the situation.

Perhaps the most serious challenge when it comes to community housing is the looming end of operating agreements, as housing providers pay off their mortgages. The federal

subsidies associated with these agreements are gradually phasing out and ending within the next decade, with a significant decrease of funding in the next five years. The problem is twofold. As mortgages end, agreements expire and funding ceases, some housing providers may no longer be financially viable and may cease to operate unless provided additional financial assistance from service system managers.⁴ It is promising that the federal government has committed to keeping the baseline funding from the operating agreements in the system.

In other cases, without an operating agreement or funding, existing housing providers may choose to sell their units or convert them to market rentals. This would affect the housing stability of tenants and decrease the overall supply of community housing stock. At the same time, service system managers are still obligated under provincial legislation to provide the same amount of assistance to continue to meet the Service Level Standards as prescribed under the *Housing Services Act, 2011* and regulations. If housing providers take units out of the system, service system managers will be left scrambling to replace them. They may also have to provide alternate housing benefits to affected households so they can continue to afford their housing, and to prevent possible economic evictions.

The end of operating agreements threatens to chip away at the supply and preservation of community housing. Municipal governments and other Service System Managers have been assessing the problem and finding solutions.⁵ The government is set to issue legislation to address the matter. For a transitional period, housing providers would continue to operate with a community housing mandate, unless exempted from the *Housing Services Act* by the Minister. While a welcome move, it is a short-term solution. Ongoing discussions are necessary to find a long-term solution for this complex issue. It is promising to see the attention paid by MMAH to working with both Service System Managers and housing providers to find solutions that work for all involved, including tenants to maintain their housing stability.

Another issue affecting sustainability relates to the Ontario Works (OW) and the Ontario Disability Support Program (ODSP) and the shifting of costs to service system managers. The issue is that the provincial government has set historically low rent scales for community housing tenants living in RGI units who receive OW or ODSP as their sole source of income. These rent scales have not been adjusted for decades. Under provincial rules, tenants receiving OW or ODSP benefits receive much lower amounts for shelter if they live in community housing when compared to what they would receive if they were paying rent to landlords in private buildings. This means that community housing providers receive lower rental income and require greater subsidy from service system managers to cover their operating costs. This differential is often several hundred dollars per month per rental unit, costing service system managers millions of dollars each year in additional RGI subsidy funding.

⁴ AMO and the Housing Services Corporation examined the issue of viability in a post-operating agreement environment. For further information see: <https://share.hscorp.ca/files/208-social-housing-end-dates-in-ontario-2012-2/>

⁵ Housing Services Corporation has developed a resource toolkit to assist Service System Managers, see: <https://share.hscorp.ca/post-slider/evaluating-projects-reaching-expiry-the-service-manager-eoa-toolkit/>

In effect, low and inadequate rent scales result in a hidden municipal subsidy of provincial income support programs paid for with property tax dollars. There is also no clear rationale to explain why household rent and associated shelter allowance amounts paid to community housing providers for OW and ODSP households in receipt of RGI are less than what is paid to private landlords. There should be parity. Addressing this issue will place community housing on a more sustainable footing. In 2012, the Commission for the Review of Social Assistance for Ontario calculated the fiscal impact of outdated rent scales to service system managers at \$200 million annually.¹⁶ These funds could be used to address capital repairs and to improve quality of life for tenants.

Another issue relates to energy efficiency. The previous provincial government introduced capital retrofit programs to reduce green house gas emissions and create more energy efficient community housing. These programs demonstrated an immediate impact reducing operating costs for buildings. Now that the provincial cap and trade initiative has wound down, there is no more dedicated provincial funding for community housing energy retrofits. These investments improved building performance and enhanced the quality of life for tenants while reducing greenhouse gas emissions. In doing so, the phased-out program filled an important need in community housing because most of Ontario's community housing buildings were built at a time when little attention was paid to energy-efficient design. Retrofits benefited vulnerable tenants by reducing the cost of their utility bills. Given the value of energy retrofit programs, Ontario's municipal governments would support the introduction of an alternative provincial funding envelope to finance energy efficiency retrofit supports in community housing.

Recommendation #41: That the provincial and federal governments commit to permanent, predictable, and sustainable base funding that supports both asset management and the renewal of community housing.

Recommendation #42: That the provincial and federal governments provide sufficient and ongoing funding to help eliminate the current community housing capital repair backlog in Ontario to achieve and maintain a good state of repair.

Recommendation #43: That the provincial government work with Service System Managers to assess the impact of the end of federal operating agreements and the separate issue of end of mortgages on their community housing portfolios.

Recommendation #44: That the provincial government provide clarity and certainty regarding the obligations of community housing providers and Service System Managers upon the expiry of federal operating agreements and the end of mortgages to ensure that housing stability is maintained for existing tenants.

Recommendation #45: That the provincial government end municipal subsidy of social assistance recipients in community housing by addressing the antiquated rent scales.

Recommendation #46: That the provincial and federal governments promote environmental sustainability in community housing with dedicated funding for energy efficient retrofits that bring down energy costs and improve housing provider sustainability over the long-term.

✓ **Reduce Administrative Burden to Help Service System Managers Do Their Jobs**

Various measures could be taken to reduce administrative burden and costs for Service System Managers and community housing providers.

Top of mind are the complexities of the wait list system, which is costly and burdensome to administer. The provincial government has committed to reforming wait list administration as part of its Community Housing Renewal Strategy and has engaged with Service System Managers as it contemplates reforms. This is a positive step forward. A new, more flexible approach would allow for better management of community housing waitlists in a way that is effective and cost efficient.

Simplifying Rent-Geared-to-Income (RGI) will also help service system managers, housing providers and tenants. The current system is costly and burdensome to administer. It is also complex and confusing for tenants. Reform as initially proposed by the government in the Community Housing Renewal Strategy should serve to bring down cost-prohibitive administration costs while making life easier for those who live in community housing if implemented appropriately. A new system that leverages the Canada Revenue Agency's Income Tax Verification System would help streamline the process. Simplification should not make any tenant materially worse off than before, nor should it increase costs for service system managers. Addressing the rent scales issue should be viewed as a complimentary exercise to RGI simplification.

The reporting burden is another challenge for service system managers. While collecting data to gauge performance and make evidence-based decisions is critical, too many resources are being shifted away from front line services for administrative purposes because of intensive reporting requirements. Currently Service System Managers submit the Service Manager Annual Information Return (SMAIR). This is done in part by using data collected from individual housing providers' Annual Information Return (AIR). The SMAIR and the AIR are based on the reporting requirements set out in the Canada-Ontario Social Housing Agreement, 1999 (SHA). Separate reporting requirements for housing programs further add to the administrative burden. AMO acknowledges the importance of complying with federal funding transfer reporting requirements. However, as the programs are only part of the overall portfolio, statistical data collection and analysis is often done manually by many service system managers. The value of this information is often unclear when it comes to evaluation and policy development.

AMO appreciates MMAH's efforts to streamline reporting. We look forward to the results of this provincial initiative. Federal reporting requirements under the National Housing Strategy (NHS) is a live conversation. While some reporting will be necessary to monitor and evaluate NHS initiatives, the federal government should keep in line with Ontario's shift towards reducing the reporting burden. To keep administration costs down, only necessary

data should be collected. Reporting should happen at reasonable intervals and in a transparent manner.

Data that is collected on a province-wide basis should be shared with service system managers to support continuous improvement and better local service system planning. For example, it would be helpful if the Province used the 10-Year Housing and Homelessness Plans submitted by each service system manager to identify common themes, activities, beneficial practices, and proposed outcomes. This information and related data should inform the growing repository of evidence-based practices.

Recommendation #47: That the provincial government simplify the administration of the RGI system for Service System Managers, community housing providers, and tenants of community housing, including addressing rent and utility scales at the same time.

Recommendation #48: That the provincial and federal governments update community housing-related reporting requirements to better support evidence-based policy decisions while reducing administrative burden and cost. Technological innovation should be leveraged to facilitate reporting and to improve data collection and analysis as well as service delivery.

✓ **Increase Flexibility for Municipal Governments and Service System Managers**

To encourage Service System Managers to succeed and to increase the delivery of provincial and local municipal priorities, it is strongly recommended that those delivering housing services be given greater flexibility, authority, and reduced 'red tape'. In particular, Service System Managers should have maximum flexibility to identify and address local priorities based on the municipal context. It is appreciated that the federal-provincial funding programs under the National Housing Strategy reflect and afford a great deal of flexibility.

Two areas that would benefit from more flexibility is the application of subsidies and the management of the waiting list. Both are complex and administratively burdensome in their current form and AMO hopes waitlist administration will improve pending the implementation of reforms under the Community Housing Renewal Strategy.

It is challenging to implement provincial priorities ahead of local priorities. The province-wide priorities may not always speak to the greatest need locally. It might be best if provincial priorities were guidelines for service system managers to consider. No two municipal geographies in Ontario are the same, meaning that more locally flexible and less prescriptive requirements are important. 'One-size-fits all' approaches generally do not work well where local situations vary and different housing markets exist.

As it currently stands, the community housing system is designed for RGI subsidies and Portable Housing Benefits as the primary means of housing assistance. However, municipal governments are innovating with new forms of housing assistance to better match applicants with housing options and to make better use of waiting list resources. The problem is that this innovation with housing assistance is not officially recognized in the *Housing Services Act, 2011* and its regulations. As a result, some innovative housing supports do not count

towards Service System Managers' legislated Service Level Standards. Innovative approaches require a business case for the Minister to approve on case-by-case basis.

Just as the *Housing Services Act, 2011* was amended to recently allow housing benefits to be accepted as a legitimate form of housing assistance, other forms of housing support should also be recognized. For example, condominiums are sometimes purchased and rented out to tenants at below-market rents. This kind of activity should be recognized as housing assistance. A change in this area would not cost the Province anything to implement. It would also provide added flexibility to support innovation at the local level. A good start would be for the provincial government to review the outcomes of these service system manager initiatives with the goal of identifying best practices and modernizing the service level standards.

Greater flexibility is also needed for capital housing infrastructure programs. Take, for example, the 'use it or lose it' approach, which refers to the inability to carry over funds from one fiscal year to the next. This funding approach makes it prohibitive to build larger housing projects in communities and is especially problematic for smaller Service System Managers. Federal-provincial capital housing programs should operate with the same flexibility as other federal and provincial infrastructure programs that allow carry-over from one fiscal year to the next. This would allow for proper planning and implementation for the best long-term housing outcomes.

Recommendation #49: The provincial government should increase local flexibility and support innovation by broadening the provincial approach to Service Level Standards to include all types of housing subsidy assistance administered by Service System Managers.

Recommendation #50: That the provincial government work with the federal government to make housing capital programs more effective by eliminating the 'use it or lose it' approach to funding and allow Service System Managers to carry over funding between fiscal years similar to other federal and provincial infrastructure programs.

3) Expanding Affordable Housing Options

Steps should be taken to further facilitate the expansion of other affordable housing options in Ontario, including non-profit, co-operative and private sector projects. This will ease pressure on subsidized rental housing and fill in the gap where the private market fails to provide suitable housing for low- and moderate-income people.

One challenge is that an increasing share of federal-provincial funding programs under the National Housing Strategy will be going towards financing portable housing benefits instead of the construction of new units or the repair of community housing.⁶ While these benefits

⁶ A Portable Housing Benefit is a form of financial assistance (i.e. cash allowance) provided to eligible low-income individuals and family units on municipal community housing waiting lists to help pay their rents. It is a portable benefit not tied to a particular building or landlord. With this benefit, individuals and families can

to help low-income families pay their rent are a longstanding municipal ask and a welcome tool in the municipal tool kit, funding for portable benefits cannot replace funding to build and maintain affordable housing units. This is especially important given current vacancy rates in some areas across the province.

Although the recipients' ability to exercise choice in deciding where they will live in the private market is beneficial, portable housing benefits only work well in places with higher vacancy rates and ample supply of affordable, purpose-built rental. They also work well to help individuals in immediate need of housing support, such as people experiencing homelessness or survivors of domestic violence and human trafficking. Federal-provincial funding programs need to strike a balance so that these initiatives can support the use of portable benefits while also contributing to the development of new housing supply. Discussion is needed to ensure that portable housing benefit-related program design provides local flexibility. Any portable housing benefit must be calculated in a way that ensures the benefit amount is enough to cover actual costs in local housing markets.

Currently, survivors of domestic violence and human trafficking receive special priority on community housing waiting lists for RGI subsidies. Over the years, the Special Priority Policy (SPP) has received mixed reviews when it comes to its' effectiveness in supporting survivors. It is not always the preferred option for women, men, and families fleeing abuse. A dedicated provincially-funded portable housing allowance program specific to these survivors is the better policy option. The existing Portable Housing Benefit – Special Priority Policy program should therefore continue and be enhanced. In addition, funding should be provided to establish and maintain much needed community supports for these households.

The Strong Communities Rent Supplement Program is an important housing option that is at risk. It enables service system managers to fund RGI rent supplement agreements in their communities. The program's 20-year funding commitment ends in 2022/23. The end of this program will take \$50 million a year from Ontario's community housing system, reducing access to affordable housing. It will also place more vulnerable households at risk. Funding for this program must continue beyond 2023. If funding is not renewed, then a transitional funding plan will be necessary to protect tenants currently using the program.

Another funding program with potential to expand housing options is the National Co-Investment Fund administered by the CMHC. AMO is pleased to see the federal government move forward with this housing infrastructure initiative. While there have been positive efforts to consult with service system managers, there are some concerns about the onerous application process and administrative and reporting burdens associated with the potential funding. The challenge, especially for smaller rural, northern and Indigenous housing providers, is that the scoring criteria reduces the chances that their projects will be approved. Many applicants have found it challenging to meet the environmental and accessibility targets while staying focused on affordability.

exercise choice in the housing marketplace to choose their place of living, either in a non-profit, co-operative or private rental accommodation. It is considered an alternative form of housing assistance to traditional RGI units in community housing.

In addition, supporting documentation and professional opinions and studies currently required for the application can be both cost and resource prohibitive. AMO acknowledges that this is a new program and appreciates that the CMHC is actively learning through the process and making improvements as they go. It is essential that feedback through the National Housing Strategy Trilateral Coordination Forum and other mechanisms foster continuous improvement to ensure that housing projects are successfully approved and implemented as per the federal government's plan.

Affordable housing development requires stable funding with an ability to stage and plan developments over longer time periods. This allows for work with both private and non-profit developers. Municipal governments and DSSABs need to be able to engage private developers as partners in affordable development. Allowing stacking of housing funding with other government capital development programs and incentives, including through Infrastructure Ontario (IO), would help. Land is a major cost. Municipal governments provide land for affordable housing development where they can. Contributions of land from both the provincial and federal governments will also help and are needed.

Access to low-rate financing would renew and expand affordable housing infrastructure. Low-rate financing can come from a broad range of sources, including both government and the private sector. On the government side, there is financing available from the CMHC and provincially from Infrastructure Ontario (IO). However, DSSABs are not able to access financing from IO. A legislative change is needed to permit this.

Private sector financing is available and has great potential. However, private sector lenders are not always well versed with the realities of community and affordable housing. Therefore, the establishment of a dedicated housing lender is welcome. The [Housing Investment Corporation \(HIC\)](#), which raises financing from private capital markets, is a welcome value-added addition to the housing sector.

Like community housing, many affordable housing buildings that received upfront government funding but no ongoing funding face sustainability challenges of their own. This includes capital repair backlogs as the buildings age. Providing occasional assistance for these projects is worth exploring, whether it be grants or low-cost loans.

Recommendation #51: That the provincial and federal governments accompany the increasing use of Portable Housing Benefits with efforts to increase the supply of rental housing including private, non-profit, and co-operative housing.

Recommendation #52: That the provincial government continue to address the housing affordability needs of survivors of domestic violence and human trafficking through dedicated community supports and an enhanced portable housing benefit program.

Recommendation #53: That the provincial government develop a strategy for the expiration of the time-limited Strong Communities Rent Supplement program to either sustain the program or manage its transition so that it doesn't cause housing instability for existing tenants.

Recommendation #54: The provincial and federal government should provide surplus or under-used crown lands to municipal governments and Service System Managers contingent on building affordable and/or 'missing middle' housing solutions.

Recommendation #55: That the provincial and federal governments move expeditiously to develop their housing strategies in consultation with Indigenous communities and service providers and provide adequate resources for implementation.

4) Ending Homelessness

Every Ontarian deserves a place to call home. On any given night, there are approximately 9,600 Ontarians experiencing 'visible' homelessness. Around 90,000 Ontarians experience this type of homelessness a year.¹⁷ On the other hand, estimates suggest that as many as 80% of Ontario's homeless population experience 'hidden homelessness.'¹⁸ This means that they are couch surfing, sleeping in abandoned farmhouses, or camping in remote locations. These Ontarians are difficult to track – their experiences are not captured by homeless enumeration counts and statistics.

All Ontarians experiencing homelessness need immediate access to permanent housing alongside services and supports that will help them get back on their feet. Investing in Housing First approaches and supports will generate savings in the long run — homeless Ontarians are more frequent users of costly services such as ambulances, hospitals, and correctional facilities. According to the Homelessness Hub, a single-shelter bed costs Canadian provinces about \$1,932 a month. A provincial jail cell costs \$4,333 a month and a hospital bed costs \$10,900.¹⁹ Given these costs, it is significantly cheaper to provide these Ontarians with stable housing and the supports they need to stay off the streets.

An all-of-government approach is the best way to address homelessness in Ontario. To end chronic homelessness, we must break down silos across government and leverage positive working relationships between the province and the 47 Service System Managers on the front lines. Predictable, stable, and enhanced funding streams from both the provincial and federal governments are needed to improve and expand homelessness prevention programs across the province. With this in place, Service System Managers can work on the ground to eliminate chronic homelessness by 2025.

Indigenous people are currently overrepresented in the homeless population. The reasons are complex and specific housing interventions are necessary. Indigenous communities and Indigenous service providers should be engaged to determine what is needed to address the unique housing challenges facing Indigenous people. The federal government should examine and modify existing approaches to address Indigenous homelessness.

Recommendation #56: That the provincial, federal, and municipal governments use an all-of-government approach to break down silos between ministries, departments, divisions and agencies, and make

commitments beyond current programs (e.g. health, income security) to address the affordable housing and homelessness crisis.

Recommendation #57: That the provincial government renew a commitment to end chronic homelessness by 2025 and work with Service System Managers on a province-wide plan to accomplish this goal.

Recommendation #58: That the provincial government sustain and increase funding for homelessness prevention and housing programs to help achieve the goal of eliminating chronic homelessness by 2025.

Recommendation #59: That the federal government enhance funding for homelessness prevention programs with a goal of expanding funding to all 47 service management areas in Ontario.

Recommendation #60: That the federal and provincial governments accelerate development of specific housing and homelessness prevention initiatives for Indigenous people in consultation with Indigenous communities and service providers.

5) Supporting People with their Health Care Needs for Successful Tenancies

Access to supportive housing promotes independent living for people with complex health needs including mental health, addictions, and trauma. It allows them to stay in their communities for as long as possible and enjoy the highest quality of life available. Supportive housing assistance typically includes services like access to personal support workers, light housekeeping, meal preparation, wellness, and health promotion. People in supportive housing may also be matched with caseworkers and receive counselling, income support and life-skills training, amongst other supports. These services are necessary given the diverse health needs of people in need of housing solutions.

Through Budget 2019, the provincial government committed to do a comprehensive review to identify opportunities to streamline the more than 20 supportive housing programs in Ontario with the goal of improving coordination. To better serve people with housing and health care needs, AMO encourages the province to move forward with the goal of creating 30,000 new supportive housing units in Ontario with rent subsidies.

Another challenge is that in many instances community housing has become ‘de facto’ supportive housing. This is due to the supply shortage and a lack of health service funding. Some tenants require intensive supports to maintain successful tenancies including home care, mental health, and addictions support. Community housing providers typically do not have the professional staff resources or funds to provide these critical services. Providing this type of service is not the intent of community housing. A gap results because provincially funded community services can be difficult for tenants to access.

For these reasons, we need to start conversations on how funding from the Ministry of Health can be better used to provide more support to help people maintain stable community housing. The 2019 Ontario Budget committed an investment of \$3.8 billion for mental health, addictions and housing supports over 10 years, beginning with building a mental health and addictions system. As well, a Cabinet shuffle in June 2019 created a new Associate Minister of Mental Health and Addictions dedicated to addressing mental health needs in local communities. Service System Managers are in the best position to inform how the new system can help tenants as well as those experiencing homelessness. Stronger, more collaborative relationships between the Province, health institutions, and Service System Managers will be key moving forward.

Recommendation #61: That the provincial government work towards a goal of establishing and maintaining 30,000 supportive housing units in the province.

Recommendation #62: That the provincial government ensure systemic collaboration between the new Ontario Health Teams and Service System Managers to ensure that people in community housing and those experiencing homelessness receive the support they need to access housing, maintain stable tenancies and meet their health needs.

Recommendation #63: That the provincial government direct local health teams under the new health care system to provide supports to tenants residing in community housing that have health needs.

Conclusion — Looking Forward and Next Steps

In Ontario, the municipal role in housing and homelessness prevention cannot be understated. We are critical players on the front lines and make a meaningful difference for our communities with support from the provincial and federal governments. Given this role in housing, municipal governments and DSSABs are well-positioned to provide advice going forward on what is necessary to address the housing affordability and supply crisis negatively affecting our communities.

The recommendations in this paper should serve as the foundation for ongoing conversations with both the provincial and federal governments. In particular, the National Housing Strategy framework creates a platform for the federal, provincial, and municipal orders of government to come together to talk about how best to improve housing outcomes for the people of Ontario. The AMO-Ontario Memorandum of Understanding political table and staff working groups should continue to help facilitate municipal-provincial discussions on the housing file.

Municipal governments are on the front lines. We are ready to co-design frameworks and programs with our provincial and federal partners. Working together, we can make a meaningful difference for people in need of housing supports and fix the housing crisis.

Appendix A: AMO Affordable Housing and Homelessness Task Force Membership (2015 to 2018)

Jamie McGarvey, **Chair**, AMO President and Mayor, Town of Parry Sound

Darryl Wolk, Manager, Policy Development & Public Affairs, Ontario Municipal Social Service Association (OMSSA)

Douglas Bartholomew-Saunders, Commissioner of Community Services, Region of Waterloo

Eddie Alton, Director of Social Services, County of Wellington

Elaine Brunn Shaw, Director of Planning, City of Cambridge

Eric Duncan, Warden, United Counties of Stormont, Dundas & Glengarry, and Chair, Eastern Ontario Warden Caucus

Helen Harris, Coordinator, Policy & Research, Ontario Non-Profit Housing Association (ONPHA)

Henry Wall, Chief Administrative Officer, Kenora District Services Board

John Taylor, Councillor, Regional Municipality of York

Mabel Watt, Manager, Policy Integration (CAO's Office) , Region of Halton

Mark Taylor, Deputy Mayor, City of Ottawa

Pam Sayne, Councillor, Township of Minden Hills

Sean Gadon, Director, Affordable Housing Office, City of Toronto

Sharad Kerur, Executive Director, Ontario Non-Profit Housing Association (ONPHA)

Simone Swail, Manager, Government Relations, Ontario Region, Co-operative Housing Federation of Canada

Michael Jacek, Senior Advisor, Association of Municipalities of Ontario (AMO)

Jessica Schmidt, Policy Advisor, Association of Municipalities of Ontario (AMO)

Leslie Muñoz, Policy Advisor, Association of Municipalities of Ontario (AMO)

Appendix B: Summary of Recommendations

Increasing the Supply of Affordable Market Housing for Families

✓ **Streamline to Speed Up the Approval Process by Addressing Implementation Challenges**

Recommendation #1: That municipal governments continue to work to ensure that zoning by-laws are up to date with official plans.

Recommendation #2: That municipal governments pursue and move towards e-permitting if they have the resources.

Recommendation #3: That municipal governments consider the benefit of third-party coordinating engineers as a potential option.

Recommendation #4: That municipal governments explore the benefits of offering one-window 'concierge services' to fast track priority proposals.

Recommendation #5: That municipal governments consider whether adopting a Community Planning Permit System would meet the needs of their local communities.

Recommendation #6: That municipal governments consider succession management strategies to ensure that they can continue to employ well-qualified building inspectors.

Recommendation #7: That the provincial government modernize notice provisions.

Recommendation #8: That the provincial government continue to document and disseminate Best Management Practices (BMPs) and provide data support to municipal governments to foster learning, resulting in continuous improvement.

Recommendation #9: That the provincial government provide support to housing developers including sharing of BMPs.

Recommendation #10: That the provincial government provide training to help municipal governments increase the supply of building inspectors.

Recommendation #11: That housing developers take steps to ensure they submit complete, quality applications to reduce timelines and reduce the number of resubmissions.

Recommendation #12: That housing developers take good care to prepare comprehensive site plans.

Recommendation #13: That housing developers diligently and completely fulfill contractual Clearing Conditions in a timely manner.

Recommendation #14: That housing developers ensure timely building inspections to keep projects on track and on schedule.

✓ **Promote a Mix of Housing and Missing Middle Housing**

Recommendation #15: That the provincial government provide further information and promote awareness among municipal governments of their ability to enact inclusionary zoning by-laws, including on the new rules following the Royal Assent of Bill 108.

Recommendation #16: That municipal governments revisit zoning to explore zero-lot- line housing, tiny homes, laneway housing, flex housing, shared housing and other types of housing that reduce land costs and increase density.

Recommendation #17: That the provincial government consider financial incentives for developers to encourage missing middle-type housing for moderate-income families.

Recommendation #18: That the provincial government support growth of new housing supply with corresponding investments in infrastructure including schools, hospitals, transit, and transportation.

Recommendation #19: That the provincial government work in partnership with municipal governments to change public attitudes opposed to intensification by making the public more aware of the negative impact of sprawl on the environment, traffic congestion, and on the costs of municipal services.

Recommendation #20: That the provincial government ensure there is enough flexibility and supports for municipal governments to look at underused and strategically located employment lands for mixed-uses, including housing.

Recommendation #21: That developers consider a menu of finishes so that more modest options are available.

Recommendation #22: That developers consider the potential for expandable/reducible units (i.e. time-share units often have the option of combining adjoining units for larger floor plans or closing off access for small units).

Recommendation #23: That developers design buildings in a way that allows for the future installation of accessible features.

✓ **Support the Cost of New Housing Supply through Existing Tools**

Recommendation #24: Municipal governments should continue to exercise the ability to voluntarily provide financial incentives when they are able, and at their sole discretion, to facilitate the targeted development of new affordable housing in line with local municipal objectives.

Recommendation #25: The provincial government should ensure development charges and community benefits charges are calculated in a way that ensures growth pays for growth.

Recommendation #26: The provincial government should consider allocating revenues generated from the land transfer tax and the non-resident speculation tax to affordable housing and for financial incentives to encourage housing solutions for moderate-income households.

✓ **Explore Innovative Housing Solutions**

Recommendation #27: That municipal governments continue to work with developers to encourage innovative housing while still conforming to the standards of the Ontario Building Code.

Recommendation #28: That the provincial government research and disseminate promising practices from other jurisdictions about how to facilitate innovative housing supply.

Recommendation #29: That the provincial and federal governments ensure that municipal governments continue to have the discretion to offer home ownership programs and renovation support programs with funding from federal-provincial housing programs available under the National Housing Strategy.

Recommendation #30: That the provincial government explore and pilot new innovative home ownership programs with municipal governments for low- and moderate-income people, with a special focus on first-time homebuyers, including shared-equity schemes and rent-to-own approaches.

Recommendation #31: That the provincial government advocate to the federal government for more robust home ownership programs.

Recommendation #32: That the provincial government research and share promising practices to make better use of existing homes, buildings, and neighbourhoods to increase the supply of housing (e.g. matchmaker services that facilitate shared living arrangements between seniors in “over-housed” situations and renters, including students).

Recommendation #33: That the provincial government consider a “Yes in My Backyard” initiative to address NIMBYism and change public attitudes against new ‘missing middle’ and community housing developments.

✓ **Protecting Tenants while Balancing Landlord Rights**

Recommendation #34: The provincial government should consider input from the public, including landlord and tenant organizations, to find the appropriate balance between landlord and tenant rights and obligations.

Recommendation #35: The provincial government should provide more public education to both landlords and tenants on their rights and obligations.

Recommendation #36: The provincial government should provide investment and incentives for purpose-built rental housing.

Recommendation #37: The provincial government should explore ways to speed up the landlord and tenant board process, including by addressing the adjudicator shortage.

Recommendation #38: The provincial government should promote awareness and provide information to municipal governments about ways to effectively facilitate legal second suites and new rentals in a manner that meets the needs of communities.

Recommendation #39: Municipal governments should exercise their ability under the Planning Act to facilitate the creation of legal second suites and new rentals in a manner that meets the needs of communities, conforms appropriately to municipal by-laws, and advances public safety.

Recommendation #40: The provincial government should provide low cost loans to homeowners who wish to renovate to create new legal second units in accordance with local municipal by-laws.

Creating a Financially Sustainable Model for Community Housing

✓ **Review and Improve Funding Arrangements to Secure Permanent, Predictable Funding for Housing Supports**

Recommendation #41: That the provincial and federal governments commit to permanent, predictable, and sustainable base funding that supports both asset management and the renewal of community housing.

Recommendation #42: That the provincial and federal governments provide sufficient and ongoing funding to help eliminate the current community housing capital repair backlog in Ontario to achieve and maintain a good state of repair.

Recommendation #43: That the provincial government work with Service System Managers to assess the impact of the end of federal operating agreements and the separate issue of end of mortgages on their community housing portfolios.

Recommendation #44: That the provincial government provide clarity and certainty regarding the obligations of community housing providers and Service System Managers upon the expiry of federal operating agreements and the end of mortgages to ensure that housing stability is maintained for existing tenants.

Recommendation #45: That the provincial government end municipal subsidy of social assistance recipients in community housing by addressing the antiquated rent scales.

Recommendation #46: That the provincial and federal governments promote environmental sustainability in community housing with dedicated funding for energy efficient retrofits that bring down energy costs and improve housing provider sustainability over the long-term.

✓ **Reduce Administrative Burden to Help Service System Managers Do Their Jobs**

Recommendation #47: That the provincial government simplify the administration of the RGI system for Service System Managers, community housing providers, and tenants of community housing, including addressing rent and utility scales at the same time.

Recommendation #48: That the provincial and federal governments update community housing-related reporting requirements to better support evidence-based policy decisions while reducing administrative burden and cost. Technological innovation should be leveraged to facilitate reporting and to improve data collection and analysis as well as service delivery.

✓ **Increase Flexibility for Municipal Governments and Service System Managers**

Recommendation #49: The provincial government should increase local flexibility and support innovation by broadening the provincial approach to Service Level Standards to include all types of housing subsidy assistance administered by Service System Managers.

Recommendation #50: That the provincial government work with the federal government to make housing capital programs more effective by eliminating the 'use it or lose it' approach to funding and allow Service System Managers to carry over funding between fiscal years similar to other federal and provincial infrastructure programs.

Expanding Affordable Housing Options

Recommendation #51: That the provincial and federal governments accompany the increasing use of Portable Housing Benefits with efforts to increase the supply of rental housing including private, non-profit, and co-operative housing.

Recommendation #52: That the provincial government continue to address the housing affordability needs of survivors of domestic violence and human trafficking through dedicated community supports and an enhanced portable housing benefit program.

Recommendation #53: That the provincial government develop a strategy for the expiration of the time-limited Strong Communities Rent Supplement program to either sustain the program or manage its transition so that it doesn't cause housing instability for existing tenants.

Recommendation #54: The provincial and federal government should provide surplus or under-used crown lands to municipal governments and Service System Managers contingent on building affordable and/or 'missing middle' housing solutions.

Recommendation #55: That the provincial and federal governments move expeditiously to develop their housing strategies in consultation with Indigenous communities and service providers and provide adequate resources for implementation.

Ending Homelessness

Recommendation #56: That the provincial, federal, and municipal governments use an all-of-government approach to break down silos between ministries, departments, divisions and agencies, and make commitments beyond current programs (e.g. health, income security) to address the affordable housing and homelessness crisis.

Recommendation #57: That the provincial government renew a commitment to end chronic homelessness by 2025 and work with Service System Managers on a province-wide plan to accomplish this goal.

Recommendation #58: That the provincial government sustain and increase funding for homelessness prevention and housing programs to help achieve the goal of eliminating chronic homelessness by 2025.

Recommendation #59: That the federal government enhance funding for homelessness prevention programs with a goal of expanding funding to all 47 service management areas in Ontario.

Recommendation #60: That the federal and provincial governments accelerate development of specific housing and homelessness prevention initiatives for Indigenous people in consultation with Indigenous communities and service providers.

Supporting People with their Health Care Needs for Successful Tenancies

Recommendation #61: That the provincial government work towards a goal of establishing and maintaining 30,000 supportive housing units in the province.

Recommendation #62: That the provincial government ensure systemic collaboration between the new Ontario Health Teams and Service System Managers to ensure that people in community housing and those experiencing homelessness receive the support they need to access housing, maintain stable tenancies and meet their health needs.

Recommendation #63: That the provincial government direct local health teams under the new health care system to provide supports to tenants residing in community housing that have health needs.

End Notes

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- ³ Canada Mortgage and Housing Corporation. “Overview: Ontario” *Housing Market Information Portal*. Accessed January 2019. <https://www03.cmhc-schl.gc.ca/hmip-pimh/en#Profile/35/2/Ontario>
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