



Social Planning Council of York Region

July 22, 2020

Regional Chair Emmerson and Members of Regional Council

Affordable Housing Coalition of York Region Submission re: Amendment 1 A Place to Grow

Thank you for the opportunity to make a submission regarding Amendment 1 to A Place to Grow Act. My name is Yvonne Kelly, I am the co-Chair of the Social Planning Council of York Region and today I am writing on behalf of the newly formed Affordable Housing Coalition of York Region (AHCYR). Our membership is comprised of individuals from organizations that serve the homeless or precariously housed, concerned residents, individuals with lived experience of homelessness and members with experience in planning and building not-for-profit housing.

By way of introduction to our Coalitions, I'd like to share our three-fold Purpose:

- To promote Housing as a Human Right
- To take leadership on sharing information and resources necessary to increase safe, affordable housing options for residents of York Region
- To facilitate capacity building and networking among coalition members.

The lack of affordable housing options and in particular, rental housing options across York Region presents an immense challenge to individuals, families, social service organizations, employers and the community at large. That is why we are fully committed to efforts that increase affordable housing options across York Region.

Right now we'd like to share our concerns re: Amendment 1 to **A Place to Grow Act**. We concur with York Region staff comments on the proposed Land Needs Assessment Methodology with a focus on requesting sufficient direction to ensure Growth Plan objectives are met. ***"While the proposed methodology places increased emphasis on addressing the needs of the market and historical trends, clear direction on how the market is to be balanced with other Growth Plan objectives towards higher density, transit supportive and walkable communities focused on producing a variety of affordable housing forms is not provided."*** The absence of language or direction re: Growth Plan priorities such as the need for a variety of affordable housing options is of real concern.

Land Needs Assessment:

The amendment states that **the proposed new methodology aims to provide the key factors to be considered by municipalities in order to ensure that a sufficient and appropriate mix of land is available to accommodate: a., b., c., and d. (We will pose our concerns and questions in relation to a. and b. below)**

a. All Housing market segments, to avoid supply shortages

- Does this mean single use large lot developments will be changed to allow for low rise multiple use dwellings? You cannot subdivide a large lot and put on two high end homes, rather, you subdivide a lot and if tear down is involved, the lot must be used for low rise multiple dwelling. Low rise multiple use dwellings should be encouraged on all major streets.

b. Market demand

- Market demand has been determined by the builders for single use family dwellings, especially high end.
- How will the market ensure:
 - o That there is affordable housing developed for lower income families as a percentage of the total development? Will a percentage be mandated for all types of housing development? (Percentage being 20% or more? That additional incentives be made available to builders with proposals for 50% or higher percentage of affordable housing rentals in their proposed buildings?)
 - o That landlords must be residents of the country in which their units are located as an attempt to stop money laundering via real estate?
 - o That large existing properties such as underutilised malls can be redeveloped for mixed use housing and shopping with a dedicated percentage for affordable housing mixed (20% +) throughout the development?
 - When there is this type of development, could planning approvals be fast tracked?
 - Could there be provisions for transit to be in place before occupancy?
 - o That single story strip plazas will not be allowed? Rather plazas should be multiple story allowing for owners and employees to live above their place of work. Do single story strip plazas count as Provincially Significant Employment Zones?

- o That public buildings such as fire stations, administrative buildings, community centres etc., are not built as single story but as multiple story to allow for affordable housing and the missing middle?
- o That developers do not hold on to land without servicing it for more than 3 years after servicing approvals have been granted, in order to prevent land speculation? If significant work has not begun then the developer must reapply and pay the ensuing costs.
- o That builders are to be encouraged to build up and not out, to ensure economies of scale for infrastructure costs?

Mineral Aggregate Operations:

- The Places to Grow legislation should remain as is to encourage research in the application of recycled products. Green assessments should remain in place but the implementation and approval of green technologies should be enhanced.

Further to our highlighted concerns and questions regarding the absence of details regarding Density and Affordable Housing options in Amendment 1 we would like to offer additional thoughts on opportunities to increase affordable housing options at the municipal and regional level. The acquisition of land, either through expropriation or lease, by local governments, is the most reliable and expeditious way for affordable housing to be built. Not-for-profit organizations (NFPs) are able to apply for and access CMHC seed funding and eventually long-term low-interest loans, and are in a unique position to build what is required for priority populations. The main barrier standing in the way is access to land.

In April 2019, a study was published by the Centre for Urban Research and Land Development at Ryerson U. titled, "Governments in Ontario Making Headway in Using Surplus Lands for Housing." The study identified Ontario as having the largest share of households (27.6%) paying more than 30% of their income on housing. The Report states that to tackle the affordability issue, governments at all levels have turned to the use of surplus public land to build affordable housing. This could include selling at market price or below, or leasing land for development. The report cited examples across Ontario (Windsor, London, Peel Region, Toronto) and Canada where municipal lands have been used for this purpose, many of which were successful in acquiring CMHC funds. For ex. the City of Toronto identified 11 properties for 40,000 new affordable housing units over 12 years, one of which is 705 Warden Avenue, a 7.1 acre TTC parking lot to be repurposed for mixed use affordable housing.

Long term leasing (30 to 50 years) of municipal lands at nominal rates could be the solution. The land remains owned by a municipality while CMHC provides funds for NFP organizations and/or developers, to construct/operate affordable housing, making considerable investments

in the community. Whereas private developers usually offer between 5-15% of their units as affordable, when required to do so, NFPs traditionally include 50-80% of affordable units in their buildings. By paying serious attention to and supporting the capacity of Not-for-Profit organizations/developers to invest in purpose built, affordable rental stock, provincial, regional and municipal governments can accelerate the growth of affordable housing options.

Thank you for your consideration of our submission. If you would like any clarification or to discuss this further, please don't hesitate to contact us by emailing socialplanningcouncilyr@gmail.com

Sincerely,

Yvonne Kelly

Co-Chair, Social Planning Council of York Region

Founding Member of the Affordable Housing Coalition of York Region