



Submission to the Ontario Legislature on the proposed More Homes for Everyone Act, 2022

By the Housing Assessment Resource Tools (HART) project, based at University of British Columbia's Housing Research Collaborative

Contact: Dr. Carolyn Whitzman, Adjunct Professor, University of Ottawa, Expert Advisor to the HART project cwhitzma@uottawa.ca

April 7, 2022

The [Housing Assessment Resource Tools \(HART\) project](#) is working with 14 governments across Canada to improve and standardize measurements of housing need and to improve planning and policy interventions towards progressive realization of an adequate home for everyone.

Eight of our government partners are in Ontario, including the six municipalities and regions within the Greater Toronto and Hamilton Area, the City of Ottawa, and Beaverhouse First Nation in Temiskaming Region.

We wish to offer the following comments and recommended amendments to the proposed Act:

First, we welcome the commitment to coordinated and streamlined joint provincial and municipal action for “homes for everyone”. Expedited housing approvals, particularly those based on streamlined “as of right” zoning (curiously, not carried over from the recommendations of your government’s [Ontario Housing Affordability Task Force](#)) would enable economically and environmentally sound as well as socially equitable outcomes. In support of this general direction, we recommend that the overall objective of the Act should be consistent with other federal, provincial and municipal objectives. The Canadian government’s [National Housing Strategy Act](#) (2019) commits all constituent governments to the “progressive realization of the right to housing”. [The National Housing Strategy](#) (2017) provides a federal commitment to lifting 235,000 households out of “housing need” (those living in unaffordable and/or overcrowded or uninhabitable homes). The [federal government](#) has further committed to ending chronic homelessness by 2030. These objectives are the basis for [federal-provincial housing agreements](#) as well as [federal-municipal agreements](#). **We therefore recommend an amendment that explicitly states the objective of the Act to be the progressive realization of the right to adequate housing for all Ontarians.**

Second, we applaud the commitment to “targeted policies for the immediate term that makes housing fairer”. In support of this, we commend our own ongoing research on housing need assessment. By June 2022, we expect to have analysed a Statistics Canada special order of the 2016 census in order to determine the household incomes, sizes, and demographics of the [748,310](#) households in Ontario who in need (almost half of Canadian households who are in need). We know

that the [national median income](#) of those households in need is \$23,227. Eighty percent of those households in need have before-tax incomes of \$35,808, and [two-thirds](#) of households in need are renters. **We therefore recommend an amendment that focuses expedited home production at affordable rents (or mortgage carrying costs) of less than \$580/ month, or no more than \$895/month, regardless of the size of the household.**

These housing costs can be achieved through mechanisms such as:

- Provincial targets based on analysis of census data informing municipal and regional targets to address housing need; followed by requiring all 47 governments in Ontario who have authority over housing to develop [equity-based zoning bylaws](#) and Official Plans, as is the case in Edmonton and Vancouver. These should include minimum non-profit housing targets of at least 25% (with hefty fines for those governments who do not achieve these targets), as is the case in [France](#);
- Free lease of well-located government and non-profit land, including provincial land near transit stations, for non-profit housing, as is the case in [British Columbia](#) (BC also has publicly owned annual [property assessment](#), which allows transparency as to who owns land and the possibility of municipalities capturing a proportion of the rapid wealth that has been created by home prices doubling in the past decade; we would recommend that the province return to a publicly owned assessment system);
- Meaningful Inclusionary Zoning of 20% non-profit, up to 20% rent regulated and 20% 3+ bedrooms permitted throughout communities (not just small areas near transit stations), as allowed by the [Québec](#) government;
- Programs for municipalities to [acquire at risk affordable](#) rental properties, as recommended by the Federation of Canadian Municipalities

Third, we recommend a greater emphasis on retaining more affordable homes for everyone, as well as new build. By October 2022, 2021 census data pertaining to costs of housing should be released. Unless trends from 2011 to 2016 radically change, we expect to find that [15 affordable homes at \\$750 lost for every one new affordable home enabled](#) by government programs. The most important mechanism to retain affordability of existing rental homes is to close the [vacancy decontrol](#) loophole, which puts hundreds of thousands of affordable homes in Ontario at risk of financialization by large Real Estate Investment Trusts. Provinces can also enable, or even mandate, the use of [rent retention](#) and [rental-only](#) zoning bylaws as has [worked effectively](#) in British Columbia to increase social and affordable rental homes.

Thank you for the opportunity to comment today.