



ONTARIO NON-PROFIT  
HOUSING ASSOCIATION

Sean Fraser  
Director, Provincial Planning Policy Branch  
Local Government and Planning Policy Division  
Ministry of Municipal Affairs and Housing  
777 Bay Street, 13 Floor  
Toronto, ON  
M5G 2E5  
[planningconsultation@ontario.ca](mailto:planningconsultation@ontario.ca)

October 21, 2019

## RE: ONPHA's Response to the Provincial Policy Statement Review

Dear Sean Fraser,

The Ontario Non-Profit Housing Association (ONPHA) is a member funded and directed association that represents over 730 community housing landlords and local housing corporations in 220 communities across the province, and growing. Our sector owns \$30 billion in assets (excluding land value), and provides affordable housing options for over 425,000 Ontarians. ONPHA is well-positioned to inform and deliver efficient and effective housing solutions to address affordability challenges in a fiscally responsible manner, simultaneously saving government money.

Our members drive innovation. They are resourceful at achieving strong outcomes within fixed funding envelopes. They look for ways to modernize our sector, improve services to vulnerable Ontarians and reduce operational costs. Working with governments at all levels, our organization and members play a foundational role in helping to create well-planned, socially and economically diverse communities. We are a strong partner: we are committed to doing our part to ensure the housing needs of low-and-moderate income earners are met.

When it was elected, Ontario's government committed to creating jobs, putting more money in peoples' pockets, opening the province for business and respecting taxpayers. These objectives are



clear in the province's vision for an updated Provincial Policy Statement (PPS). By updating the PPS, the province can increase Ontario's housing supply and reduce barriers to the land use planning system, unlocking greater spending power for Ontarians and making life more affordable. These objectives align with ONPHA's vision and strategic plan to build a foundation for a province where every Ontarian has a safe and affordable place to call home.

The PPS review is an opportunity to include bold, proactive measures municipalities can use to create affordable housing, support mixed-income neighborhoods and grow inclusive communities.

We know the affordable housing crisis in Ontario continues to grow. In the province, 46% of all renter households live in core housing need. More than 185,000 households are on waiting lists for subsidized housing. Ontario must build at least 137,000 more rental homes, many of which need to be deeply affordable, by 2029 to accommodate growth and backlogs.<sup>1</sup>

ONPHA recently surveyed our membership about future plans around development. Nearly half the survey respondents are in the development process or completed a development project within the last two years. Another 26% said their organization is seriously considering or planning new developments within the next three to five years. We also know many more would pursue development if given the opportunity. Increasing opportunities for non-profit housing developers is critical to increase Ontario's housing's affordability. Ontario's non-profit housing providers are largely social purpose organizations. Their organizational missions are to provide safe, affordable long-term housing options to low-and-middle income families across the province. In short, a strong and vibrant non-profit housing sector is essential to achieve PPS objectives.

As a result, ONPHA broadly supports the government's intended outcomes for changes to the PPS to increase housing supply. If implemented, the proposed policies will support an increased housing supply, create jobs, reduce unnecessary bureaucratic red tape, protect Ontarians' health, safety and the well-being of the communities they live in, and our environment.

The next sections detail ONPHA's position on key components for consideration as the province works with an array of stakeholders to ensure every Ontarian can access affordable housing options in their communities.

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<sup>1</sup> ONPHA and CHF Canada (2018), *An Affordable Housing Plan for Ontario*. Available at: [http://onpha.on.ca/Content/Advocacy\\_and\\_research/Advocacy/Affordable\\_housing\\_plan/An\\_Affordable\\_Housing\\_Plan\\_for\\_Ontario.aspx](http://onpha.on.ca/Content/Advocacy_and_research/Advocacy/Affordable_housing_plan/An_Affordable_Housing_Plan_for_Ontario.aspx)



## INCREASING HOUSING SUPPLY AND MIX

ONPHA is pleased to see a proposed new requirement for municipalities to align minimum targets of housing for low and moderate households with applicable housing and homelessness plans. Given that local Housing and Homelessness Plans are strategic road maps on housing for Ontario's municipal sector, this proposed alignment makes sense. We support the draft policy changes proposed by the province so long as:

- Municipalities have ample discretion to plan and guide development to meet local contexts as per their Official Plans and 10 Year Housing and Homelessness Plans prescribed under the *Housing Services Act, 2011*. The province should support municipalities in doing so, in part, by enhancing access to planning tools like inclusionary zoning, prioritizing community housing developers within surplus government land initiatives and ensuring that affordable housing goals can be supported through the newly established Community Benefits Charges regime. We strongly believe these planning tools should be strategically used and implemented in areas that are experiencing significant affordability and supply gaps.
- Clarity would also be appreciated as to the best use of planning tools in two-tiered municipalities where the housing function sits with upper-tier governments while many planning policies and tools are enacted by local municipalities.

## SUPPORTING RURAL, NORTHERN AND INDIGENOUS COMMUNITIES

ONPHA is pleased to see the government's commitment to supporting rural, northern and Indigenous communities through various planning measures. From a housing perspective specifically, and to achieve the government's simultaneous goal of alignment between planning and applicable housing and homeless plans, we recommend that:

- The province and municipalities work to recognize and address the unique situations of District Social Services Administration Boards (DSSABs). DSSABs were created to carry out social services funding and administrative responsibilities, including housing, in northern regions of Ontario where there are no existing municipal government with legal jurisdiction to act as a Consolidated Municipal Service Manager. DSSABs face unique challenges: they work over multiple municipalities but often have varying levels of engagement from these municipalities in the development of their Official Plans. The province and municipalities must work together with the Northern Ontario Service Deliverers Association (NOSDA) to ensure DSSABs are



meaningfully included and consulted in assessing housing need and developing housing related plans within these regions.

## REDUCING BARRIERS AND COSTS

ONPHA supports initiatives to reduce barriers and costs related to planning so long as:

- The province consults with and considers recommendations and comments put forth by the Association of Municipalities Ontario (AMO) in response to the provincial Housing Supply Action Plan and its accompanying legislation and regulations with the current PPS review. As the voice representing local government across this province, AMO is in the best position to comment on the realities, impacts and implications for municipalities.

ONPHA is pleased the provincial government recognizes the importance of increasing Ontario's housing supply. Overall, we believe the government's proposed amendments to PPS strike the right balance to increase housing supply.

However, while improving land use planning policies is an important goal, changes to the PPS will not meaningfully increase Ontario's housing supply on their own. Achieving an adequate supply of affordable housing requires a comprehensive system of provincial incentives, a significant portion of which should be targeted towards creating and repairing community housing for low-income Ontarians. New programs and investments targeted towards these goals under the Community Housing Renewal Strategy will go a long way towards contributing to these goals, however we know further efforts are needed to address the significant housing affordability challenges currently facing Ontario. While we understand the Province faces significant fiscal pressures, we believe there are many no cost/low cost initiatives that can enable this objective.

To truly solve Ontario's housing shortage and crisis, the government should work with both private and non-profit sectors to increase supply and options across the entire housing continuum. This includes community-based non-profit and co-op housing, supportive housing and Indigenous housing. ONPHA's members are well-positioned and ready to work with governments at all three levels to achieve this outcome.

Thank you for the opportunity to provide input towards Ontario's PPS review. ONPHA and our members remain eager and ready to continue working with government partners to achieve an Ontario where everyone has a safe and affordable place to call home. Working together we can



ensure that safe, affordable housing options are a reality for Ontario's low-and-middle income population.

Sincerely,

Marlene Coffey  
CEO, ONPHA

CC: Joshua Paul, Assistant Deputy Minister, Housing Division, Ministry of Municipal Affairs and Housing

ONPHA Board of Directors