



Centre for Equality Rights in Accommodation  
Centre pour les droits à l'égalité au logement

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**Re: Provincial Policy Statement 2019**

**About CERA**

The Centre for Equality Rights in Accommodation (“CERA”) is a not-for-profit charitable organization dedicated to preventing evictions, ending housing discrimination and addressing human rights violations in housing across Ontario. For sixteen years, CERA has served 1500 clients annually who are facing eviction and human rights violations in their housing, such as the need for accommodation for disability. We also work with tenants, landlords, post-secondary institutions, community partners and the public to deliver public education to communities and vulnerable individuals to build the capacity of Ontarians to understand their housing rights. CERA’s high volume of clients gives us unique and current insight into the issues faced by renters across the GTA, particularly vulnerable renters, including seniors, newcomers to Canada, racialized individuals, persons with disabilities, and families.

## Introduction

The provincial government is seeking feedback on proposed changes to the Provincial Policy Statement 2019 (PPS) to support the government’s “*More Homes, More Choice: Ontario’s Housing Supply Action Plan*” and other land use planning related priorities.<sup>1</sup> The PPS, issued under s. 3 of the *Planning Act* (Act),<sup>2</sup> is the primary provincial policy document that guides decision-making on land use planning matters – for both the government and municipalities across the province.<sup>3</sup> The PPS is key for municipalities – impacting their local official plans, zoning by-laws and other planning-related decisions.<sup>4</sup> – CERA appreciates the opportunity to provide comments at this time.

CERA supports the key policy directions identified by the Province. In particular, we are pleased to see a commitment to an increased mix of housing. Moreover, the inclusion of affordable and other “missing middle” type housing under the term “housing options,” and the requirement that municipalities implement the targets set in their housing plans are steps in the right direction.

CERA is concerned, however, that the proposed revisions shift focus away from the critical needs of Ontarians.

This submission responds to the following questions posed by the province<sup>5</sup>:

1. Do the proposed policies effectively support goals related to increased housing supply, creating and maintaining jobs, and red tape reduction while continuing to protect the environment, farmland, and public health and safety?
2. Do the proposed policies strike the right balance? Why or why not?
3. Are there any policy changes that are needed to support key priorities for housing, job creation, and streamlining of development approvals?

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<sup>1</sup> The Environmental Registry of Ontario “Provincial Policy Statement Review - Proposed Policies” (July 2019) Online, [https://prod-environmental-registry.s3.amazonaws.com/2019-07/EN\\_PPS%20Proposed%20Policies\\_July2019.pdf](https://prod-environmental-registry.s3.amazonaws.com/2019-07/EN_PPS%20Proposed%20Policies_July2019.pdf)

<sup>2</sup> *Planning Act*, R.S.O. 1990, c. P. 13.

<sup>3</sup> Act, s. 3(5)(a).

<sup>4</sup> See, for example, City of Toronto “Proposed Revisions to the Provincial Policy Statement – Preliminary City Comments” (October 1, 2019). Online, [https://www.toronto.ca/legdocs/mmis/2019/ph/bgrd/backgroundfile-138422.pdf#xd\\_co\\_f=NzAzODFjNmUtM2VkZi00ZjlkLW14YjAtZDU1Njc4NDFlYzBl~](https://www.toronto.ca/legdocs/mmis/2019/ph/bgrd/backgroundfile-138422.pdf#xd_co_f=NzAzODFjNmUtM2VkZi00ZjlkLW14YjAtZDU1Njc4NDFlYzBl~)

<sup>5</sup> The Environmental Registry of Ontario “Provincial Policy Statement Review - Proposed Policies” (July 2019) Online, [https://prod-environmental-registry.s3.amazonaws.com/2019-07/EN\\_PPS%20Proposed%20Policies\\_July2019.pdf](https://prod-environmental-registry.s3.amazonaws.com/2019-07/EN_PPS%20Proposed%20Policies_July2019.pdf).

4. How do these proposed policies take into consideration the views of Ontario's communities?
5. Are there other tools that are needed to help implement the proposed policies?

### **Adequate Housing First**

CERA's feedback seeks to emphasize the centrality of adequate housing<sup>6</sup> for the future success and prosperity of this province. The province cannot support goals such as mixed housing development, a healthy economy, meaningful job creation and the protection of the environment and Indigenous communities without sufficient consideration of the pervasive housing and homelessness crises in Ontario. An integrative and proactive approach, which places people at the centre of decision-making, is required for effective long-term land-use planning with positive outcomes for this province.

#### *Misplaced Emphasis on Market Considerations*

Adequate housing must be the first and most pressing priority for this government, and with this, all other planning objectives will flow. We know that market-based solutions are insufficient to provide the kind of housing that Ontarians need. Those in core housing need – including seniors, youth, newcomers, people on low-income, single parents, indigenous and racialized communities – all have different needs and requirements regarding what is affordable and adequate housing.

CERA is concerned about the introduction of market-based language into the PPS. Specifically, the inclusion of the terms: *market based* (1.1.1), *market demand* (1.1.3.8), *market-based need* (1.4.3) and *dynamic market-based needs* (1.7.1).<sup>7</sup> CERA is concerned that the approach based on an assumption that housing is a commodity rather than a necessity does not work. Finding a home should never be akin to purchasing a pair of shoes. Ontario is facing a housing and homelessness crisis that requires urgent attention. We have an inadequate housing system, which privileges home ownership and discriminates against low-income households stuck in the declining low end of the rental sector. These are factors well outside the scope of the free market.

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<sup>6</sup> The United Nations Committee on Economic, Social and Cultural Rights identifies seven necessary components of adequate housing: affordability, security of tenure, accessibility, habitability, location, availability of services, materials, facilities and infrastructure and cultural adequacy.

<sup>7</sup> The Environmental Registry of Ontario "Provincial Policy Statement Review - Proposed Policies" (July 2019) Online, [https://prod-environmental-registry.s3.amazonaws.com/2019-07/EN\\_PPS%20Proposed%20Policies\\_July2019.pdf](https://prod-environmental-registry.s3.amazonaws.com/2019-07/EN_PPS%20Proposed%20Policies_July2019.pdf).

Further, there is no evidence that market mechanisms are an effective tool for the provision of affordable and attainable housing.<sup>8</sup> Competitive markets were designed to provide for people who are willing and able to pay for what they want. Markets respond to market demand. If households have too little income or wealth to stimulate market demand for a particular good, the market will ignore them.

Distributional inequalities are therefore a natural result of market models. Continuing to treat housing like a commodity and providing housing for only those who are able to afford it is not only unethical, it is ultimately inefficient. Homelessness alone costs the Canadian economy over \$7 billion per year.<sup>9</sup>

We urgently need to address our crisis of housing affordability by creating an adequate system of supports for households that do not have a place in the housing market. CERA urges the province to reconsider of the use of market-based language and focus instead on the *social need* for housing with supportive solutions and emergency relief.

### *Misplaced Emphasis on Supply*

The increase of housing supply cannot be treated as an all-encompassing strategy to the housing crisis, particularly given the lack of evidence of its effectiveness. The City of Toronto has noted that on an annual basis over the past five years, Council has approved more units than were completed. Despite an increased supply of new units, and the number of units approved but not yet built, the cost of housing in the City has continued to rise.<sup>10</sup> This contradicts the assumption that increased supply of housing will decrease prices of land and housing. That is because housing supply cannot exist in a vacuum. Increasing wealth and income inequality and changing demographics are reflected in the growing mismatch between the type of housing supplied and the type that is demanded in Ontario. Commitment to providing a wide range of affordable and attainable housing requires non-market housing strategies that focus on the type of housing provided not simply the quantity.

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<sup>8</sup> Hulchanski, J. David. "Rethinking Canada's housing affordability challenge." *Centre for Urban and Community Studies, University of Toronto* (2005).

<sup>9</sup> Homeless Hub "The Housing Market and Canada's Economic Recovery" Online, [https://www.homelesshub.ca/sites/default/files/The\\_Housing\\_Market\\_and\\_Canada%E2%80%99s\\_Economic\\_Recovery.pdf](https://www.homelesshub.ca/sites/default/files/The_Housing_Market_and_Canada%E2%80%99s_Economic_Recovery.pdf)

<sup>10</sup> City of Toronto "Proposed Revisions to the Provincial Policy Statement – Preliminary City Comments" (October 1, 2019). Online, [https://www.toronto.ca/legdocs/mmis/2019/ph/bgrd/backgroundfile-138422.pdf#xd\\_co\\_f=NzAzODFjNmUtM2VkZi00ZjlkLWI4YjAtZDU1Njc4NDFlYzBl~](https://www.toronto.ca/legdocs/mmis/2019/ph/bgrd/backgroundfile-138422.pdf#xd_co_f=NzAzODFjNmUtM2VkZi00ZjlkLWI4YjAtZDU1Njc4NDFlYzBl~)

The focus on increased supply reflects the province's desire to accelerate approvals and fast-track development. CERA is concerned that this will only benefit developers, speculators and landlords and not middle class or low-income households or marginalized communities. The language of the proposed policies must directly address the needs of those whose current living situation threatens their wellbeing, such as: the elderly, refugees, those struggling with addiction or mental health issues, those experiencing homelessness and people trapped in poverty. Building “strong, sustainable and healthy communities” is not possible without a wide range of inclusive and affordable housing options that reflect specific needs of Ontarian populations.

### *Adequate Housing Achieves Other Objectives*

The province has listed the development of the economy and job creation as a main goal for the proposed policies. CERA urges the province not to separate its economic development and affordable housing goals. Welfare economists have provided strong evidence that quality affordable housing generates improved social and economic outcomes for low-and-moderate-income households. For example, when renter households move from unaffordable housing to affordable housing, the percentage of their income that they spend on housing decreases. This results in increased purchasing power and spending on goods and services, which stimulates the local economy and leads to the creation of more jobs.<sup>11</sup> CERA urges the province to consider affordable housing as a basic prerequisite for economic prosperity and stability.

Not only is it the responsibility of the province to provide policies that support the dignity, safety and inclusion of each Ontarian, it is also in their best interest. CERA recommends the proposed policies be revised to incorporate evidence-based solutions and facilitate coordination, engagement and consultations with both the public and other levels of government in order to adequately support the provision of affordable and attainable housing.

### **Conclusion**

It is the responsibility of the province to implement policies that support the dignity, safety and inclusion of each Ontarian and this starts with the provision of adequate housing. CERA

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<sup>11</sup> Ontario Non-Profit Housing Association “Affordable housing as economic development” Online, [https://www.onpha.on.ca/Content/PolicyAndResearch/Other\\_Research/Housing\\_and\\_Economic\\_Growth.aspx](https://www.onpha.on.ca/Content/PolicyAndResearch/Other_Research/Housing_and_Economic_Growth.aspx)

recommends the proposed PPS be revised to incorporate evidence-based, people-centered solutions and facilitate coordination, engagement and consultations with the public and other levels of government. Besides providing a foundation for health and academic achievement, access to affordable housing is key to attracting business investment and human capital and supporting a thriving economy. Families who spend less on housing, contribute more to the local economy by purchasing services and goods, supporting the development and growth of local businesses. It is in the best interests of Ontario to meaningfully and boldly address its housing and homelessness crisis as a basic prerequisite for economic prosperity and stability.