



Ontario Public Health Association
 l'Association pour la santé publique de l'Ontario
 Established/Établi 1949

The mission of OPHA is to provide leadership on issues affecting the public's health and to strengthen the impact of people who are active in public and community health throughout Ontario.

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Constituent Societies

Alliance for Healthier Communities

Association of Public Health
 Epidemiologists in Ontario (APHEO)

Association of Supervisors of
 Public Health Inspectors of Ontario
 (ASPHIO)

Canadian Institute of Public Health
 Inspectors (Ontario Branch) (CIPHIO)

Community Health Nurses'
 Initiatives Group (RNAO)

Health Promotion Ontario (HPO)

Ontario Association of Public
 Health Dentistry (OAPHD)

Ontario Association of Public Health
 Nursing Leaders, (OAPHNL)

Ontario Dietitians in Public Health
 (ODPH)

Ontario Society of Physical Activity
 Promoters in Public Health (OSPAPPH)

Ontario Ministry of Municipal Affairs and Housing
 College Park 17th Floor
 777 Bay St, Toronto
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January 25, 2019

Dear Sir/Madam,

Re: Consultation: Increasing Housing Supply in Ontario

Thank you for the opportunity to provide feedback on the consultation document: Increasing Housing Supply in Ontario. Our organization, the Ontario Public Health Association (OPHA), offers various recommendations and comments for consideration as your ministry develops its Provincial Housing Supply Action Plan.

Many of OPHA's members include public health professionals working at the local level to improve health through the implementation of the Ontario Public Health Standards. These Standards include a mandate to work with municipalities and other partners to improve health outcomes and address the impacts of the social determinants of health such as those related to housing conditions.

Not unlike many of the issues we are faced with in public health, the relationship between housing and health is complex and multi-faceted. People living in poor housing conditions face disadvantages across a range of health, social and economic dimensions. Housing is an important determinant of health and an often under recognized source of health risks for Ontarians, especially for low-income and marginalized tenants, including vulnerable sub-populations such as seniors, children and pregnant women. Living in sub-standard housing^{1, 2} can result in greater exposure to physical and environmental toxins and allergens. It can also negatively impact physical and

¹ Brochure: Maintenance and Repairs (2018). Landlord and Tenant Board. Social Justice Tribunals Ontario,

² O.Reg. 517/06 Maintenance Standards under the Residential Tenancies Act, 2006, Ontario; Building Code Act; Property Standards Bylaws

mental health and increase the risk of acquiring certain infectious and chronic diseases.

“Housing below standards” (referring to housing that falls short of at least one of the adequacy, affordability and suitability housing standards³) persists among different population groups in Canada. In 2011, as many as 3.8 million Canadian households were living in housing below standards. While affordability is the most common reason for households to be living in housing below standards, housing in need of major repair and overcrowding are also of great concern.⁴

Several important factors contribute to healthy, adequate and affordable housing. These include: cost of rental/ownership, cost of utilities (e.g. heating costs); quality of housing (e.g. not in need of major repairs, free from mould, safety of water supply); size adequate for number of occupants; neighborhood safety and housing security; proximity to transit and other amenities such as schools, healthy food, greenspace and community services; and protection from environmental exposures (e.g. air pollution and noise from traffic, shade, flood protection).

OPHA is pleased to see that the Province is committed to addressing barriers to adequate housing supply across Ontario as access to housing can contribute to improved health. In addressing housing supply, OPHA strongly advocates that the Province consider, as a top priority, the need for housing that is not only affordable, but also safe and healthy. Our key recommendations for consideration are listed below and outlined in more detail in Appendix A. They include the following:

- Protect Ontarians’ right to live in safe and healthy homes by maintaining health and safety regulations for affordable housing development.
- Promote healthy complete communities by building housing in the right places, with convenient access to a mix of housing, an appropriate range of employment opportunities, local services, supports for aging in place, and accessible community infrastructure.
- Encourage the supply of housing for the ‘missing middle’ – a range of affordable multi-unit housing types such as row houses, multiplexes and small apartments; and units with three or more bedrooms for families.
- Implement measures (e.g. incentives or controls) to ensure that home-owners and renters on fixed and low to middle incomes are not pushed out of their existing homes due to rising costs (e.g. rental, property taxes, etc.) as their neighbourhoods develop.
- Promote higher density development within existing settlement boundaries to minimize the cost of service provision and encourage development on remediated brownfield sites where there are existing municipal services.
- Ensure that the rental system works equally well for tenants and landlords with all relevant agencies working collaboratively to ensure healthy and adequate housing for all.
- Explore innovative housing tenure, design, construction techniques and programs to increase affordable housing supply and options for individuals and families.

³ Canada Mortgage and Housing Association, Government of Canada

⁴ Public Health Agency of Canada. (2018). Key Health Inequities in Canada. A National Portrait. Health Canada.

The OPHA would like to thank the Province for its efforts to promote affordable, safe and healthy housing. Your consideration of our recommendations is appreciated. We welcome any opportunities to engage in further consultation with your ministry on this topic.



Pegeen Walsh
Executive Director

About the Ontario Public Health Association:

OPHA is a member-based charity that has been advancing the public health agenda since 1949. OPHA provides leadership on issues affecting the public's health and strengthens the impact of those who are active in public and community health throughout Ontario. OPHA does this through a variety of means including promoting public dialogue and education on healthy public policy, capacity building, research and knowledge exchange. Our membership brings together many different disciplines and sectors working together to achieve our shared vision of optimal health for all.

Appendix A: Detailed Responses to Consultation Questions

1.0 *Speed: It takes too long for development to get approved.*

OPHA recommends that the Housing Supply Plan includes measures to protect Ontarians' right to live in safe and healthy homes.

OPHA understands that increasing the efficiency of development approvals could benefit developers by getting housing projects built faster and reducing costs accrued due to delays. However, increasing the efficiency of approvals may have negative health and safety impacts on Ontarians if important regulations are weakened. Ontarians should not be subjected to unhealthy or unsafe housing conditions as a consequence of actions to speed up the development approval process.

Specifically, OPHA recommends that the Province:

- Ensure consistency and the continued monitoring of health and safety standards when reviewing regulations and procedures of housing developments.

There is strong and well-established evidence that various biological, chemical, and physical exposures in the home have adverse health effects. Examples of physical/chemical exposures include lead, which is harmful to the brain, nervous system, blood system, and kidneys; asbestos, which can cause various cancers; and radon, which can cause lung cancer. There is also strong evidence supporting a causal relationship between allergens, specifically dust mites and cockroaches and asthma. In addition, there is strong evidence of the health effects of the home's physical characteristics including: home safety/stairways, which are associated with falls and injuries; smoke detectors, which can prevent burns and smoke inhalation; heating systems, which can cause burns, smoke inhalation, and carbon monoxide poisoning; second-hand smoke, which can cause or exacerbate respiratory conditions, including lung cancer; and cold and heat, which can cause or be associated with heat stroke, respiratory infections, cardiac events, and mortality. There is also strong evidence that home dampness and mould significantly increase the risk of developing asthma.

- We recommend that the Province consider alternative ways to reduce waste and duplication in the development process. The process could be improved by fast tracking applications that demonstrate additional measures to promote healthy, sustainable communities, healthy housing and a range of housing types. Several municipalities have piloted such initiatives through the implementation of green development or sustainable development standards.

2.0 Mix: There are too many restrictions on what can be built to get the right mix of housing where it is needed.

OPHA recommends that the Province encourage the supply of housing for the ‘missing middle’ through a range of affordable multi-unit housing types such as row houses, multiplexes and small apartments; and promote healthy complete communities by supporting affordable housing development in the right places.

Healthy complete communities meet people’s needs for daily living by providing convenient access to a mix of housing, appropriate mix of jobs, local services, opportunities for aging in place and accessible community infrastructure. At the same time, it provides for separation of sensitive land uses from industrial and transportation related emissions to ensure that communities are protected from exposure to chemical contaminants. Providing a mix of land uses creates more equitable communities and allows residents to remain within their community regardless of their needs.

Achieving the right mix of housing alongside other land uses (such as employment and industrial) can provide many opportunities towards healthy sustainable and climate resilient communities and housing. That being said, it is vital that evidence is the primary driver that determines whether uses are compatible. For example, health evidence on the impact of exposure to air pollution from transportation and industrial sources must be considered in the decision.

Building a range of affordable housing units helps prevent overcrowding which is a particular issue for low income families with children. The link between overcrowding and infectious diseases such as tuberculosis in high prevalence areas has been long established.⁵ Overcrowding may also be associated with poor child mental health and social and emotional development.^{6, 7, 8} The Canadian Mortgage and Housing Corporation (CMHC) National Occupancy Standard (NOS) defines a suitable household as one with at least one bedroom for: each cohabiting adult couple; each lone parent; unattached household member 18 years of age and over; same-sex pair of children under age 18; and additional boy or girl in the family, unless there are two opposite sex children under 5 years of age, in which case they are expected to share a bedroom. A household of one individual can occupy a bachelor unit.⁹

⁵ Public Health Agency of Canada. (2007, October 22). Housing conditions that serve as risk factors for tuberculosis infection and disease - CCDR Vol.33 ACS-9 - Public Health Agency of Canada.

⁶ Canadian Paediatric Society. (2015, October 5). Housing need in Canada: Healthy lives start at home. Position statements and practice points. Canadian Paediatric Society.

⁷ Office of the Deputy Prime Minister: London. (2004). The impact of overcrowding on health and education : a review of the evidence and literature. London, UK: The United Kingdom Office of the Deputy Prime Minister.

⁸ Solari, C. D., & Mare, R. D. (2012). Housing Crowding Effects on Children’s Wellbeing. *Social Science Research*, 41(2), 464–476.

⁹ CMHC. (2014). Housing in Canada - Definitions - Suitable Housing. Retrieved December 22, 2016, from http://cmhc.beyond2020.com/HiCODefinitions_EN.html#_Suitable_dwellings

Specifically, OPHA recommends that the Province:

- Revise the inclusionary zoning (IZ) Regulations O.Reg. 232/18 to make IZ mandatory. This will enable consistency and conformity across municipalities.
- Offer incentives to developers (e.g. tax rebates on development charges) to increase purpose-built rental properties. Rental units with 3+ bedrooms should receive an even greater incentive to increase the supply of rental housing for larger households. Note that municipalities will require provincial support to overcome the funding impact that development charges rebates could have on their capacity for service development.
- Offer developers financial incentives to build missing middle housing in existing neighbourhoods (e.g., low-rise buildings, stacked townhouses, townhouses, and semi-detached houses.)
- Enable secondary units by making it illegal to exclude them through local zoning policies.
- Provide coordinated funding to municipalities to increase the amount of community hubs across Ontario. These hubs could offer a mix of residential housing, certain types of employment opportunities and other services. Health impacts of exposure to air pollution from transportation and industrial sources must be considered in deciding the appropriate types of employment to place near housing.
- Ensure adequate, health-protective separation distances between housing and sources of pollution such as high traffic corridors and industrial operations.
- Not encroach on the green and white belt areas. Instead, OPHA recommended that the Province support housing development in existing urban boundaries within neighbourhoods that are already connected to municipal servicing, amenities, employment, transit, and other community facilities.

3.0 Cost: Developments costs are too high because of high land prices and government-imposed fees and charges.

OPHA recommends that the Province: promote higher density development within existing settlement boundaries to minimize the cost of service provision; maintain development restrictions within existing urban boundaries; and encourage development on remediated brownfield sites where there are existing municipal services.

The assumption that government-imposed fees and charges are a major driver of development costs may not be supported by evidence. By contrast, there are many other policy mechanisms that could be considered to reduce the cost of development in general for developers and municipalities. For instance, the development of compact and high density communities maximizes municipal investment in services such as water and transportation. In addition, incentivizing developers to partner with health and social agencies can help promote development that meets the needs of the community.

Specifically, OPHA recommends that the Province:

- Promote development within existing settlement boundaries.

It will cost more to provide municipal services to protected areas such as the Greenbelt, compared to increasing density in areas that are already serviced by infrastructure such as water and wastewater services. Vacant sites within existing developed areas, such as remediated brownfield sites, often have the benefit of existing municipal services such as water and wastewater and road access. Development outside existing settlement areas also has multiple, significant environmental and public health impacts such as traffic-related air pollution, greenhouse gas emissions and associated health impacts as commuters travel greater distances for work and other daily activities.

- Encourage housing developers to engage in partnerships with non-profit housing providers and health and social service agencies. This will promote the provision of purposefully developed housing that meets community needs while meeting criteria for potential grants and loans such as those offered by CMHC.

4.0 Rent: It is too hard to be a landlord in Ontario, and tenants need to be protected.

OPHA recommends that the Province ensure that the rental system works equally well for tenants and landlords. All relevant agencies should work collaboratively to ensure healthy and adequate housing for all.

Through RentSafe (<https://rentsafe.ca>), an initiative to build collaboration across multiple sectors to ensure healthy housing conditions for tenants living on low income in Ontario, OPHA has worked with tenants, landlords, public health inspectors, municipal property standards officials, legal aid and frontline services workers. Through surveys and tenant focus groups, RentSafe has heard about the various challenges tenants face over and above the unaffordability of adequate housing. These include: living in unsafe and unhealthy housing conditions, not knowing who to call for help, fear of eviction and discrimination.

RentSafe also heard from 124 small-scale landlords on challenges in maintaining healthy rental housing. More than one third of respondents reported that at least one of their units needed repairs, with 9% reporting that at least one unit needed significant repairs.

Specifically, OPHA recommends that the Province:

- Consider a wide range of options to replace rent control while providing cost stability to renters without placing the burden on landlords. Solutions may include provincially-funded

subsidies for eligible landlords to offset the costs when payments are below the market value, or stronger portable subsidies so that tenants can access good quality housing in healthy and complete communities.

- Offer increased resources to agencies that provide eviction prevention and diversion to ensure greater housing stability, especially for more complex or vulnerable tenants. The lack of affordable housing and rising rental costs are continuing to impact individuals' and families' housing stability and increase risk of homelessness. As many episodes of homelessness begin with evictions, preventing evictions is key to combating homelessness. Investments in affordable and social housing, rent control policies and resources for ensuring vulnerable tenants have access to obtain representation for housing disputes and eviction notices are critical components of ensuring housing stability and success.
- Help protect tenants by creating legislation/requirements to keep rent (or a percentage of rental units) at an affordable rate.
- Provide additional supports to help tenants navigate the multiple systems and services that should work together to ensure adequate healthy housing for all. While the Landlord-Tenant Tribunal is one way that tenants' voices can be heard, it is often challenging for tenants to understand their rights and responsibilities as well as those of their landlords.
- Incentivize property managers to make the needed structural repairs to rental units. This can have multiple benefits such as improved health and safety of tenants and cost savings through energy efficiency upgrades.
- Update the *Residential Tenancies Act, 2006* to include legal requirements for housing conditions to ensure safe living conditions for tenants.
- Amend Ontario Regulation 63/09 under the *Pesticides Act, 1990* to mandate safety training for all pest control companies that apply pesticides indoors.
- Develop a Housing Benefit that provides direct assistance to renters in deep core housing need.

5.0 Innovation: Other concerns, opportunities and innovations to increase housing supply.

OPHA recommends that the province pursue innovative ways to increase the supply of healthy adequate and affordable housing through the following measures:

- Provide discounted property taxes and charges/fees for residential units that commit to being classed as affordable for 25 years or more. Municipalities will require financial support from the province to overcome revenue losses that may impact their capacity to provide services.
- Consider flexibility in minimum space requirements while continuing to ensure healthy living spaces. There are many examples world-wide of smaller and more efficient use of living space that can decrease the cost of building and maintenance.

- Prioritize energy efficiency and sustainability in housing design to ensure that building and maintenance cost remain low while protecting human health and the environment. While the Ontario Building Code has minimum standards for energy efficiency, there is opportunity to incentivize builders and developers to go beyond the Code in terms of energy efficiency, renewable energy sources and conservation. These efforts can result in improved indoor air quality while also addressing climate change.
- Building climate-resilient housing (e.g. shade for protection from extreme heat and solar radiation, stronger materials to withstand extreme weather events such as wind and ice storms, and low impact development to enhance flood protection.)
- Explore innovative housing tenure, design, construction techniques and programs to increase affordable housing supply and options for individuals and families.
- Introduce incentives to promote alternate tenure forms (e.g. life leases, co-housing and collaborative housing) and examine the opportunity for home share programs and accredited reverse mortgage programs to improve access to housing. Intergenerational campuses should be considered as a viable community development model for bringing housing, services and meeting spaces to residents of all ages. Modular construction techniques and the use of molding technologies are options available to the development industry to reduce construction cost. Innovative housing design (e.g., flexible housing, tiny homes, laneway housing and Grow Home) are adaptable to the changing needs of residents.