



BUILDING AN AFFORDABLE AND ACCESSIBLE ONTARIO FOR ALL

Written Submission to the 2019 consultation on Increasing Housing Supply in Ontario (January 25, 2019)

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Executive Summary

Who We Are

Spinal Cord Injury Ontario is an ongoing, life-resource for people with spinal cord injuries, their friends, families and service providers that starts at the onset of injury and carries through acute care, rehab and then into the community. Our organization assists people in rebuilding their lives. We have been strengthening our expertise since 1945 when our organization was first started by returning WWII Veterans with spinal cord injuries. We provide community support services to people with spinal cord injuries and other physical disabilities across Ontario. From our beginnings, Spinal Cord Injury Ontario has been a leader in peer support, navigation, employment, and attendant services; as well as knowledge generation and advocacy – a time honoured legacy that continues today.

The Issue

Housing in Ontario is one of the largest cost burdens for over 1.9 million people who live with some type of disability. Many of these individuals are low-income earners who live in inadequate housing conditions below the national poverty line and find it difficult to meet their basic essential needs. As Ontario ages, we expect the proportion of people living with a disability to increase rapidly.

In order to prepare for this changing demographic landscape, it is imperative that the Government of Ontario put in place an effective, accessible and affordable housing policy that meets the unique social and economic needs of Ontario's ageing and highly vulnerable population.

We strongly urge the Ministry of Municipal Affairs and Housing to incorporate the following **policy recommendations** in its Housing Supply Action Plan:

- 1. Increase the stock of accessible housing supply across Ontario and ensure that the new builds meet the required accessibility standards beyond the mandated Ontario Building Code and AODA built environment standards**
 - 2. Increase the supply of Rent-Geared-To-Income (RGI) housing across Ontario ensuring that minimum of 15-20% of all new RGI units are accessible and allocated to people with physical disabilities**
 - 3. Provide unique program incentivizes, such as tax breaks, bid on opportunities and or matching funds, to promote innovative partnerships between public and private agencies and create modern and competitive housing solutions for people with accessibility needs**
 - 4. Promote a standard of practice (i.e. The Rick Hansen Foundation Accessibility Certification Program)**
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Rationale for Recommendations

Recommendation 1

Increase the stock of accessible housing supply across Ontario and ensure that the new builds are aligned with the accessibility requirements beyond the mandated Ontario Building Code and AODA built environment standards.

Rationale:

Access to affordable and accessible housing is a major concern for people living with disabilities. More than 171,360 households in Ontario are waiting for a home that they can afford. Waitlists have grown by more than 45,000 households in the last 12 years, with an average applicant facing a wait of up to 4 years¹. The problem is worse for people with disabilities. It can take over 7 years for someone with a disability to find an accessible housing unit that meets their unique healthcare needs². As a result, many people are forced to extend their stays in hospitals, long-term care units and or community shelters creating an “overcrowding crisis” in Ontario.

The Ontario Building Code currently requires 10% of all newly built housing units to be accessible. However, more needs to be done to ensure that the supply of accessible housing is aligned with the population growth rate of seniors and persons with disabilities³. According to Ontario’s Population Index, 15.5% of Ontarians live with some type of disability and as the overall population ages; this number is expected to increase substantially in the coming years⁴. In order to keep up with Ontario’s increasing population demands and ensure the right and timely supply of housing, we urge the Government of Ontario to increase the accessibility criteria for all newly built developments from 10% to 15-20%.

Recommendation 2

Increase the supply of Rent-Geared-To-Income (RGI) housing across Ontario ensuring that minimum of 15-20% of all new RGI units are accessible and allocated to people disabilities.

¹ Ontario Non-Profit Housing Association. (2018). Co-operative Housing Federation of Canada (Ontario Region). (2018). *An Affordable Housing Plan for Ontario*.

² Spinal Cord Injury Ontario Client Survey. (2019). *Housing Issues Input from Regional Service Coordinators*

³ *The Building Code Act, Ontario*. Retrieved January 20, 2019, from <https://www.ontario.ca/laws/regulation/120332>

⁴ Statistics Canada. (2006, January 18). *The 2006 Participation and Activity Limitation Survey: Disability in Canada 2006*. Retrieved January 20, 2019, from <http://www5.statcan.gc.ca/bsolc/olc-cel/olc-cel?catno=89-628-XWE&lang=eng>

Rationale:

Over 1.5 million Ontario households live in rental housing. Many of these households belong to people with disabilities who are surviving on limited social supports and find it difficult to afford a suitable place that they can safely call home. People with disabilities often cannot afford the average market rent in their communities. 44.2% of all people with a disability in Canada currently reside in Ontario and this number is expected to increase rapidly as Ontario continues to age.⁵

People with disabilities face the highest number of barriers in the Ontario housing system including; accessibility barriers and lack of access to appropriate supports, fewer housing choices, and higher levels of discrimination in the housing market.

Many seniors and people with disabilities live in subsidised or Rent Geared to Income (RGI) housing. In Toronto alone, 30% of all RGI households reported living with a member who had a disability. This number has been growing steadily across all regions in Ontario resulting in an increased demand and overcrowding of RGIs across the province.⁶

In order to curb this “overcrowding crisis”, we strongly urge the Government of Ontario to increase the supply of Rent-Geared-To-Income (RGI) housing across Ontario ensuring that a minimum of 15-20% of all RGI units are allocated to persons with disabilities and aging seniors that require assistive devices.

Recommendation 3

Provide unique program incentivizes such as (tax breaks, Bid on opportunities and or matching funds) to promote innovative partnerships between Public and Private Agencies and create modern and competitive housing solutions for people with accessibility needs.

Rationale:

Over the last two decades, Ontario has relied almost exclusively on the private market to build both rental and new housing developments. This has had a catastrophic effect on people with core needs and disabilities. The cost of ownership has tripled in many parts of Ontario and rent has increased by almost 60% leaving many vulnerable households far behind when it comes to home ownership and rent affordability.⁷ The problem is further aggravated for people with disabilities who are often living in units that are old and inaccessible and that often require costly renovations to meet their accessibility needs.

⁵ Statistics Canada, *Core housing need, 2016 Census*, Release date: November 15, 2017. Retrieved from: <http://www12.statcan.gc.ca/census-recensement/2016/dp-pd/chn-biml/index-eng.cfm>

⁶ Toronto Community Housing. Retrieved January 20, 2019 from <https://www.torontohousing.ca/who-we-are>

⁷ Spinal Cord Injury Ontario (SCIO) Client Survey. (2019). *Housing Issues Input from Regional Service Coordinators*

There are a number of small funding programs that exist to provide assistance with renovations for people with disabilities, however, the criteria is often too stringent, the funding too limited to meet high cost of renovations and the process too bureaucratic to provide any substantial or meaningful support. There are a number of ways that the Government of Ontario can tackle this issue:

Opportunities to Explore:

- A. Provide tax breaks or matching funds to landlords who participate in making their property fully accessible**
- B. Create a bidding program for private real-estate developers so they can dedicate a fixed amount of funding towards building fully accessible units or allow them to request this type of funding from the government**
- C. Incentivize the private sector to participate in bidding programs by offering to match their investment (i.e. the government provides 25% - 50% of matching funding) for developers who participate in creating accessible housing units in their housing projects**
- D. Provide opportunities for Not-for-Profit and Community Housing Sector to manage available and unused land to build accessible housing units and offer to share the cost.**

We strongly urge the Government to explore the creation of unique partnerships between public and private agencies in order to design more innovative housing solutions. Public organizations such as the community housing sector plays an integral role in creating safe, accessible and affordable homes for hundreds and thousands of Ontarians. The non-profit and co-op sector, for example, owns lands all across Ontario with a leveraging capacity valued at \$199 million per year.⁸ There is a huge investment opportunity for the government to encourage pooling of resources, promoting land and housing development sharing between public and private sectors and utilizing all kinds of incentivising tools and policies to promote partnerships between the two sectors to develop affordable and accessible housing for Ontarians with accessibility needs.

Recommendation 4

Promote a standard of practice such as the Rick Hansen Foundation Accessibility Certification Program

⁸ Ontario Non-Profit Housing Association. (2018). Co-operative Housing Federation of Canada (Ontario Region). (2018). An Affordable Housing Plan for Ontario.

Rationale:

In order to prepare for Ontario's ageing population, it is imperative that we acknowledge Ontario's commitment to accessibility and put in place the necessary systems to ensure effective and appropriate planning to make Ontario accessible for all. One such way that the government can promote this is through the creation and promotion of Accessibility Certification Programs that can provide an evaluation of all commercial, institutional, and multi-unit residential buildings and sites across Ontario. An example of an existing rating system that does this quite well is the *Rick Hansen Foundation Accessibility Certification Program (RHFAC)*. RHFAC is a system that uses trained professionals with disabilities to help property owners measure the accessibility of their buildings and sites, and promote increased access through the adoption of Universal Design principles. An early adoption and promotion of such systems not only incentivize the correct implementation of accessibility standards as mandated by the AODA legislation but also ensures that developers, property owners and buyers can get a seal of approval when it comes to meeting Ontario's accessibility standards. We strongly urge the Government of Ontario to both promote such type of programs and create similar standards of practice across Ontario to ensure that we are on track to make this province accessible by 2025.

Conclusion:

The need for accessible and affordable housing in Ontario is an important policy challenge that we simply can't ignore. There is a higher cost associated with doing nothing about the issue than making upfront investments towards inclusion. A recent survey from the Angus Reid Institute showed that out of 1,800 Canadians who were surveyed; 24% were directly affected by some kind of disability, 30% were affiliated by disability or physical challenge, and 32% were extremely concerned about the state of accessibility in Canada⁹. With Ontario housing almost 50% of all of Canada's disabled population; we need to demonstrate stronger and more effective leadership when it comes to taking care of this particularly vulnerable population. We encourage the Government of Ontario to move urgently and efficiently on an accessible and affordable housing supply in Ontario.

Spinal Cord Injury Ontario and the SCI Community consider itself a partner of the Ontario Government. We appreciate the opportunity to provide feedback, support, and policy development research to you. Please continue to keep us informed about the progress of this initiative so we can inform our community accordingly.

⁹ Fayerman, Pamela. "Canadians anxious about accessibility issues as they age", *Vancouver Sun*, January 22, 2019, <https://vancouversun.com/news/local-news/canadians-anxious-about-accessibility-issues-as-they-age>