

THRIVE's SUBMISSION TO COUNCIL Re: Proposals for Jack Purdie & Centennial Parks

Issue: AFFORDABLE HOUSING

THRIVE applauds Amherstburg Council on the consultation process to date regarding the future of Jack Purdie and Centennial Parks. We understand that a survey has been distributed online for the Town's residents to complete, so that their feedback can be incorporated in the next Public Presentation (Fall 2021). Individual members of THRIVE have completed the survey. In this document, we focus on the affordable housing aspect of the proposals, and offer some general principles that we believe ought to inform Council's decision-making process. We also have a number of questions that we hope CAO Miceli or others in Administration can address before the next public session.

THRIVE's Understanding of the Parks Initiative

It is our understanding that the impetus for the two park initiatives is a desire to implement the **2018 Parks Master Plan**. Rather, the inclusion of affordable housing in some of the options presented at the Public Presentation was a means to an end; the revenue generated from selling parts of the park land would be used to pay for park amenities. At the same time, the options with an affordable housing component would also address the affordable housing shortage. Although the primary driver of the Parks initiative is not to tackle affordable housing, there is a regional plan requiring the Town to do so.

In principle, THRIVE supports the concept of achieving these three important objectives simultaneously: implement the Parks Plan, identify revenue-generating options to pay for the parks, and address the affordable housing imperative. Council is encouraged to 'multi-solve' wherever possible.

In order to ensure that the affordable housing piece is done properly, Council and residents need to have a thorough understanding both of affordable housing and best practices, and have sufficient evidence on which to make their decision. Otherwise, THRIVE fears that the inclusion of affordable housing in several options will be viewed by the Town's residents as simply a pretext for selling off park land.

What is Affordable Housing?

According to the **Windsor Essex Housing and Homelessness Master Plan**, the term 'affordable housing' encompasses a broad range of housing, including community/social housing, private market rental units, and ownership housing. Based on the Provincial Policy Statement's definition of affordable housing:

- Affordable ownership housing in Windsor Essex refers to housing that is priced at least 10% below the average purchase price of a resale unit in Windsor Essex
- Affordable rental housing in Windsor Essex refers to units rented at or below the Windsor/Essex alternate average market rent for a specified unit size.

In other words, affordable housing is simply a general term used to describe housing that is priced reasonably in light of market options.

On the other hand, the Canada Mortgage and Housing Company (CMHC) considers housing to be affordable when a **household spends less than 30% of its pre-tax income on adequate shelter.**

Based on the July Public Presentation, it is unclear if the Town envisions affordable housing in the general sense or, more specifically, as:

- some form of subsidized housing in order to address homelessness;
- social housing;
- supportive housing;
- community housing;
- or something else entirely.

Based on our research, these various terms can be defined as follows:

“*Homelessness*” refers to the problem of a lack of stable housing. It can be chronic or episodic. Persons experiencing homelessness do not necessarily live on the street. They may be ‘couch-surfing’ or sleeping in their cars. Persons spending 50% or more of their income on rent are at high risk of homelessness. THRIVE is not aware of the homelessness statistics for Amherstburg, or if such statistics are available.

“*Social housing*” is subsidized housing that is legislated under the **Housing Services Act, 2011**. The statute requires municipalities to adopt a housing and homelessness plan that meets certain requirements and that is subject to government approval and periodic review. To our knowledge, Amherstburg does not have its own housing plan, but voted in favour of the *Windsor-Essex Housing and Homelessness Plan* at the County Council.

“*Supportive housing*” refers to a combination of rent subsidies and other supports that help people with physical or developmental disabilities to live as independently as possible.

“*Community housing*” is housing owned and operated by a non-profit housing corporation, a housing co-operative, or municipal government. Private market landlords may have program agreements (or rent supplement agreements) to provide ongoing access to affordable units for households on social housing waitlists or people in need of supportive housing.

Precision of terms is key to understanding what public-private partnerships are possible, especially eligibility for government grants. More information on the different types of housing and various government programs can be found on Ontario’s Community Housing Renewal Strategy [webpage](#) and on [CMHC’s website](#).

Guiding Principles

There are a number of principles we think can usefully guide Town Council in its consideration of the various park options, particularly through the affordable housing lens. Many cities and towns have such principles. Town Council may have already drafted its own. We welcome further discussion about these basic values and best practices.

Based on our research, the following principles are relevant to the current and future housing proposals:

1. Housing is a human right. All levels of government have a legal responsibility to ensure residents have access to affordable housing.
2. It is reasonable for the Town to consider selling some park land or other municipal property for the purpose of facilitating the development of affordable housing units. At the same time, as a general principle Council should strive to avoid paving over green space if there are alternatives.
3. Inclusive design of any affordable housing development is mandatory. As stated in the City of Toronto's **Affordable Housing Design Guidelines**, "[p]lanning and designing in advance for accommodating tenants changing physical needs is not only more efficient for a landlord but provides a higher level of stability and dignity for tenants. It also is more efficient and cost effective to prepare in advance."
4. Any sale of Town property for the purposes of affordable housing development must be conditioned on a number of contractual commitments, including:
 - a. A requirement that the units will be rented at 20% below Amherstburg's average market rent for a period of at least ten years.
 - b. The materials and design of the buildings will be indistinguishable from surrounding neighbourhood designs. It is important that for-profit development respects the dignity of all our residents.
 - c. There should be a mix of unit sizes and a minimum number of fully accessible units.
5. The Town should also adopt green building standards and reward developers who meet or exceed these standards. This includes minimizing mandatory parking spaces. Any development should require analysis of its impact on climate change. For example, paving over green space can increase the risk of flooding.

Questions

To make an educated, evidence-based decision regarding the affordable housing potential in Jack Purdie and Centennial Parks, Council should address the following questions:

- Has the Town conducted a Housing Need and Demand study?
- What are the statistics or the 'face' of poverty in Amherstburg? Has there been any consultation with residents living in poverty in order to better understand the housing gaps that need to be filled?
- Is there a waitlist for social or community housing in Amherstburg?
- Has the Town's planning department tracked private market affordable housing units?
- Is the park land to be sold to a private developer with conditions, for example, that all or a certain number of units will be geared-to-income? What other conditions are feasible from legal and market perspectives?

- What federal or provincial grants or tax incentives are available to a potential private developer in this context? (For example, Community Improvement Plan tax incentives have been tapped successfully in Windsor. Tax Increment Financing is another potential incentive.)
- Has the Town considered 'inclusionary zoning' to address the affordable housing shortage? (Inclusionary zoning requires new residential development to include a percentage of affordable housing units as a condition of a development application.)
- What incentives is the Town prepared to offer the private developer of park lands (property tax rate reductions, rebates, reduced permit fees and development charges, etc.)?
- Has the Town considered designating land to permit smaller lot sizes, accessory dwelling units, or other affordable housing development?
- Has the Town explored opportunities for partnerships?

We look forward to learning more about the parks initiatives as well as Council's plans for tackling the affordable housing shortage in our town.

*Jasminka Kalajdzic & Richard Peddie
On behalf of THRIVE's Board of Directors*

July 26, 2021