



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

November 3, 2021

Carolyn Parrish
Chair of the Planning and Growth Management Committee
Region of Peel
10 Peel Centre Drive, Suite A, 6th Floor
Brampton, ON L6T 4B9

Dear Members of the Planning and Growth Management Committee,

**Re: Planning and Growth Management Committee – Housing and Inclusionary Zoning,
Regional Official Plan Amendment (ROPA)**

I am writing on behalf of the Centre for Equality Rights in Accommodation (CERA), a non-profit organization working to advance the right to adequate housing. For over thirty years, we have worked tirelessly at the intersection of human rights and housing. CERA advances the right to adequate housing by providing free services to renters facing evictions and human rights violations to remain housed, by providing education and training about housing rights across Canada, and by advancing rights-based housing policy through research, policy development, advocacy and litigation.

As you are aware, Canada is in the midst of a housing affordability crisis. In the Region of Peel many low- to mid-income households do not have access to affordable homes. Renters have been paying unaffordable rents or forced to move away from their communities, while many first-time home buyers have been priced out of the ownership market. When people live in safe, adequate and affordable homes, they are better able to meaningfully participate in their communities, cities and the economy. Pricing such groups out of the market runs the risk of segregation, the loss of community vibrance and inclusivity, and compromises the economic dynamism of the Region.

We know addressing the housing crisis require multifaceted solutions that leverage the support of all levels of government. We are writing to acknowledge the efforts of the Planning and Growth Management Committee, and the staff of the Peel Region, who worked to produce a well-informed Regional Official Plan Amendment that takes into consideration the needs of the Region and the availability of resources to meet these needs over the next thirty years. It is a concern, however, that the needs of the Region's lower income communities, who often bear the brunt of the housing crisis, will not be met by the proposed housing and Inclusionary Zoning plan.

CERA supports the targets set out in the plan, chiefly the goal of ensuring 30 percent of all new housing units satisfy affordable housing need, half of which will be dedicated to low-income households. We worry that the definition of affordability does not meet the needs of

those living on lower incomes who need deeply affordable housing. Additionally, those living in housing precarity can benefit from supportive housing options which is not captured in the Region of Peel's proposed plan.

We also support the plan to develop a range of housing types, setting clear density and intensification targets. It is important to ensure that as part of the Region's plan to increase the supply of housing, affordable purpose-built rentals are prioritized to meet the growing needs of the renter population who need access to stable rental homes. We are glad to see that the Region will further promote the creation of secondary suites.

The Region's plan to adopt Inclusionary Zoning is also an important step in equipping itself with a policy tool that can capture some of the value generated from booming property markets to redirect it towards the public good in the creation of affordable housing and mixed-income communities. It is important that the Inclusionary Zoning bylaw is strong enough to result in the building of a range of affordable units and we hope the set aside rate of 10 percent, which was deemed feasible by the NBLC report, is approved. We also acknowledge the provincially imposed geographic limits within which the Region has had to contemplate its application of the Inclusionary Zoning policy. Where major transit station areas (MTSAs) are considered, we support the Region in its plans to coordinate with municipalities to design these areas as complete communities.

Given these comments, we ask that you consider the following when approving the Regional Official Plan Amendment:

1. Increase the target for affordable rental units and supportive housing, as low-income households represent the greatest housing need in the Region. It is our hope that these units will be deeply affordable and that their affordability timeline can be expanded to 99 years.
2. Tie affordability to the incomes of the tenants rather than average market rents, which do not reflect the real time needs of renter households as asking rents are considerably higher than average market rents.
3. Prioritize ownership and administration of new affordable rental housing by non-profits, co-op housing providers and other community partners, especially those built on regionally owned and underutilized lands. Public assets should be used to build deeply affordable housing that will remain affordable in perpetuity, provided by non-profits and co-operatives.
4. Encourage affordable purpose-built rental developments, as well as the creation of secondary units in the provision of affordable housing options both within and external to MTSAs.
5. Improve intergovernmental coordination to secure funding and support to increase the supply of affordable housing.
6. Ensure a strong IZ policy is adopted and ensure frequent reviews of the policy to improve the quality of the initiative.

Thank you for your consideration of our recommendations. We look forward to providing our housing expertise as the policy evolves and welcome further discussions with the Region to

ensure this policy meets its goal of building the affordable housing the Region of Peel and its residents so desperately need.

Sincerely,

A handwritten signature in black ink that reads "B. Shadpour". The signature is written in a cursive style with a large, prominent initial "B".

Bahar Shadpour
Manager of Policy, Communications and Engagement
Centre for Equality Rights in Accommodation (CERA)