



# Increasing and Preserving Purpose-Built Rental Housing: The Need for an Ontario Strategy

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AMO's Submission to the Ministry of Municipal Affairs  
and Housing

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### Preamble

The Association of Municipalities of Ontario (AMO) is a non-partisan, non-profit association representing municipal governments across the province. Municipal governments work through AMO to achieve shared goals and meet common challenges. As the frontline order of government closest to people, municipal governments are deeply invested in the provision of housing for their residents and understand the needs of local communities.

### Introduction

The province's housing plan must include a 'made-in-Ontario' strategy to both increase and preserve purpose-built rental. While home ownership is important, rental housing is the only viable option for many Ontarians. There is scarce rental supply in most communities, and it is often unaffordable for moderate and low-income people. New rental housing needs to be built, and existing stock, especially affordable units, must be preserved.

The government is encouraged to engage in conversations with AMO, other municipal associations, housing developers (private, non-profit & cooperative), Indigenous Peoples' organizations and relevant stakeholders including tenant and landlord groups to inform the development of strategy. Following this, rental supply should be added to the mandate and workplan of the provincial Housing Supply Action Plan Implementation Team.

### Context

AMO recommended that the provincial government develop and implement a rental housing strategy as part of the [Blueprint for Action: An Integrated Approach to Address the Housing Crisis](#). There are other specific recommendations relating to rental housing that are detailed later in this submission. Other municipal associations have also raised this issue as one needing immediate attention. The Rural Ontario Municipal Association (ROMA), for example, has released a report specific to rural housing challenges entitled [Addressing Barriers to Attainable Housing and Purpose-Built Rentals in Rural Ontario](#). Their recommendations for rural areas merit due consideration.

Increasing and preserving all forms of rental accommodation is important, whether it is in the private market or non-market housing (i.e., non-profit, and cooperative). Emphasis on housing affordability is warranted with specific attention to the development of government funded affordable housing and supportive housing units for low-income, vulnerable and marginalized populations including those that are experiencing or at risk of homelessness.

## Recommendations

The following recommendations to the provincial government concerning rental housing are drawn from [AMO's Housing Blueprint](#), a Board of Directors' approved report that is based on the advice of AMO's Affordable Housing and Homelessness Prevention and Planning task forces:

1. Develop and implement a provincial Rental Housing Strategy with incentives such as tax credits and tax exemptions for private and non-profit housing developers to encourage the building of new purpose-built rental housing, and specific initiatives to meet the unique needs of rural and northern communities.
2. Review the *Residential Tenancies Act* on an ongoing basis to ensure a balance of the rights and obligations of landlords who seek a conducive environment to provide rental opportunities and tenants who need adequate protection from illegal or unreasonable "renovictions."
3. Provide more public education to both landlords and tenants on their rights and obligations.
4. Promote awareness and provide information to municipal governments and residents about ways to effectively facilitate legal second suites and new rentals in a manner that meets the needs of the communities.
5. Research and share promising practices to make better use of existing homes, buildings, and neighbourhoods to increase the supply of housing (e.g., matchmaker services that facilitate shared living arrangements between seniors in "over-housed" situations and renters, including students).
6. Work with universities and colleges to create adequate supply of residence housing for students, both domestic and international.
7. Apply an equity lens to ensure that provincial actions include solutions that address the inequities in accessing housing faced by Black, Indigenous, racialized and other marginalized people.
8. Increase social assistance shelter allowances for low-income recipients and persons with disabilities to be able to afford their shelter costs.
9. Limit appeals of community and supportive housing to the Ontario Land Tribunal.
10. Support and fund the creation of more affordable housing and purpose-built market rentals.
11. Support non-profit and co-operative housing to develop community and supportive housing through donations of crown land to municipalities and District Social Service Administration Boards with up-front pre-construction funding, capital, and ongoing operational funding.

12. Enhance renovation programs for low-income people that can preserve existing stock, delivered by municipal service managers and co-funded by the federal and provincial governments through the National Housing Strategy.
13. Provide low-cost loans to homeowners who wish to renovate to create new legal second units in accordance with local municipal bylaws.
14. Advocate to the federal government to protect lower rent market housing from “renoviction” and conversion through an acquisition program that empowers community land trusts, non-profits, cooperatives and municipal agencies to acquire and preserve existing lower rent market housing at risk of being bought by investment companies.
15. Advocate to the federal government to accelerate the development and implementation of a national Urban, Rural, and Northern Indigenous Housing Strategy with adequate and meaningful resources to achieve the agreed upon outcomes with Indigenous Peoples.\*

\*Note: AMO is also supportive of a provincial housing strategy that aligns with the federal one, which is developed in consultation with Indigenous Peoples.

These recommendations are a starting point for conversation, but there are other good ideas that merit review. The [ROMA task force report](#) addresses the unique needs of rural areas in both southern and rural Ontario, while other jurisdictions such as the province of British Columbia in Canada are paying specific attention to rental housing. There are learnings and best practices from BC that could potentially be applied in Ontario. AMO stands ready to contribute to the strategy development and has compiled an inventory of other potential measures that should be considered.

## Guiding Principles

To increase and preserve existing rental stock, the following guiding principles are relevant when developing and implementing a provincial rental strategy:

1. All orders of governments must work together to ensure that adequate and suitable stock of rental housing is available to meet demand, and that an appropriate proportion is affordable to meet the diverse needs of people including low-income families.
2. Approaches to rental housing must address inequities in accessing rental housing faced by Indigenous, Black, racialized, and other marginalized people.
3. Improving outcomes for renters must involve contributions by all orders of government and the development industry.
4. Provincial and federal governments must ensure municipal governments have sufficient flexibility to increase rental housing affordability and supply in ways that meet local need, rather than impose 'one size fits all' solutions across Ontario.
5. Rental housing policy must be integrated with broader housing affordability and homelessness efforts, as well as other policy initiatives including transportation, health, economic, and justice policy to foster sustainable and complete communities.

## Conclusion

AMO looks forward to continuing to work with the province to ensure all the people of Ontario have the housing that they need and deserve. Purpose-built rental is an essential part of the equation and the government's attention to this matter is necessary and their consideration is appreciated. AMO is not the only interested party, and many stakeholders stand ready to engage in a broader conversation to contribute to the shared goal of expanding housing options.