

APPENDIX C



ADELINA URBANSKI, Commissioner
Community and Health Services Department

August 13, 2010

Mr. Murray Boyce
Senior Project Coordinator
Town of Markham
101 Town Centre Drive
Markham, ON L3R 9W3

Dear Mr. Boyce:

**Re: Comments – Town of Markham Affordable and Special Needs Housing Strategy
Draft Discussion Paper**

Thank you for the opportunity to submit comments on the Town of Markham Affordable and Special Needs Housing Strategy Draft Discussion Paper (draft housing strategy). We congratulate you on the release of this comprehensive and ambitious plan which updates your current housing strategy and proposes to respond to Markham's housing needs between now and 2031. Our comments on behalf of the York Region Community and Health Services Department (the Department) are outlined below.

General Comments

Overall, the draft housing strategy is a comprehensive document with many goals that are aligned with regional policies and strategic directions. The strategy clearly highlights the future demographic changes and overall challenges that will be placed on the housing continuum in Markham.

The Department is concerned, however, with the number of goals and actions identified. Although each of these items is important, we would recommend that some priority scheme and timelines be established to ensure the implementation plans are clear and feasible. This would assist all stakeholders in understanding your housing priorities and approach over the term of the strategy.

In light of the comprehensive nature of the draft housing strategy, we also suggest that an executive summary be included upfront, including a summary of the goals and actions.

Specific Comments

Recommended Action 1.2 states "*Develop and fund an annual reporting system to monitor the achievement of the affordable housing targets. Further, encourage the Region to prepare an annual monitoring report so that the Regional context is well understood.*" The Region is supportive, in concept, of an annual monitoring report but currently does not have the resources or data to accomplish this task. Such an undertaking would require a specified methodology, agreed upon by each local municipality.

Recommended Action 3.8 states "*To work with the private sector and the Region of York, to encourage affordable and special needs housing be located in proximity to rapid transit routes/corridors and other amenities.*" The Department's suggestion is to strengthen the action beyond "encouragement" and to tie this recommendation to a municipal incentive for developers. The Department has received a great deal of input from its clients – seniors, youth, those in social housing or on social assistance, for example - as to the great barrier a lack of transportation is to their usage of services. It is short-sighted to approve the development of new affordable/special needs housing that is not located in close proximity to transit and other amenities.

Recommended Action 3.12 states "*Work with the Region to advocate to the Province for increases to the shelter allowance portion of social assistance funding*". The Region agrees to work together to advocate for increases to the Ontario Works (OW) shelter rate, although we need to be careful on how the advocacy is pursued. For example, the Ontario Municipal Social Services Association (OMSSA) and others have noted this as an area of concern, so the Department suggests that Markham align its strategy with others in this regard to increase the effectiveness of its advocacy efforts. We also suggest being mindful of short-term budgetary impacts for municipal government, as OW allowances will not be fully uploaded by the Province until 2018.

Recommended Action 4.4 states "*Explore opportunities to partner with the Region and community agencies to provide support programming for social housing residents in order to help them maintain their housing*" and;

Recommended Action 10.2 states "*Work with the Region and community agencies to increase support services such as life skill programming available in the home, in particular for persons with disabilities and seniors, to help alleviate pressure on special needs/supportive housing supply.*" The Region agrees with the concept of the two recommended actions but suggests that Recommended Action 4.4. be broadened to extend beyond social housing residents. Enhanced collaboration of services would reduce silos, support all residents and further the aging at home movement. The recommendations do miss a reference to funding. Most community service providers are at capacity, and without some type of funding source, the recommendations may not be achievable. The recommendations could be further enhanced through a reference to seek LHIN funding, to increase support services, as similarly proposed in other recommended actions.

Recommended Action 4.5 states *"As part of a comprehensive public education campaign, work with the Region to provide information to private landlords on the potential benefits of the rent supplement program."* A regional rent supplement program is currently in place, however the program is at capacity and no additional funding is anticipated at this time. In the absence of a capital program to build more affordable housing, a public education campaign to promote the rent supplement program would have little value. Should more affordable housing or additional rent supplement funding become available, this recommended action should be re-considered at that time.

Recommended Action 5.1 states *"Develop an 'Aging Plan', with the Region and other stakeholders such as the LHIN, to identify the needs of an aging population and identify goals and objectives for meeting these needs, including housing needs"* and Recommended Action 5.2 states *"Advocate to the Central LHIN to ensure funding for seniors housing and supports is allocated in Markham"*. The Region is supportive of these actions, and would be pleased to assist. The Region recommends that a reference to the prevention of injury be added in the context list of 5.1. Fall related injuries are a great burden on the older adult population.

Other specific comments include:

- On page 31, Recommended Action 4.4 speaks to exploring opportunities to partner with the Region and community agencies to provide support programming for social housing residents, in order to help them maintain their housing (in particular, life skills programming). The Region would be happy to explore increased opportunities to partner with Markham in this area. The Region's Community Development Investment Fund (CDIF) supports these types of programs.
- On page 34, Recommended Action 5.5, the draft housing strategy report specifically references recent immigrants, in particular for multiple-family households. The Department suggests that this be reworded to be more reflective of the diverse cultures living in Markham. It is a broad assumption that all recent immigrants live with each other, when in reality it may be established immigrants who have their family members immigrating and living with them. Also, multi-generational families may live with each other regardless of immigrant status and may have a need for multiple family dwellings.
- On page 38, Goal 7, there is a reference to photos of Leeder Place. The photos are from the old Leeder Place, which was rebuilt during the summer of 2009. Please use photos of the new Leeder Place which we will provide to you.
- On page 39, Recommended Action 7.3, we have recommended new wording, as the current wording is not entirely accurate and could be misleading. We suggest that Recommended Action 7.3 read "Support the Region in their advocacy to the Federal and Provincial governments for increased funding for homelessness programs that help residents in Markham maintain their housing." We recommend that the related context bullet read "Funding is provided directly to York Region through the provincial Consolidated Homelessness Prevention Program (CHPP), Emergency Energy Fund and Rent Bank, and the federal

Homelessness Partnership Initiative (HPI), to support services and programs to help individuals who are homeless or at risk of becoming homeless”.

- On page 40, Recommended Action 7.6, we would welcome Markham’s participation in the provision of emergency housing and would be happy to provide background information related to this goal.
- On page 41 and 42, there are references to increasing the supply of special needs housing for various disability types, but these omit sensory types (vision loss, hearing loss). Please include sensory types as well.
- On page 42, Recommended Action 8.4 speaks to working with York Region to advocate to other senior levels of government for “*increased, sustainable funding for support services in special needs housing*”. The Department recommends revising this sentence to read “...*increased and more coordinated sustainable funding....*”. The Department finds there is a lack of coordination of funding across various Ontario Ministries and organizations, and that there needs to be stronger linkages between support funding and affordable housing programs.
- On page 44, Recommended Action 9.4 speaks to working with York Region to develop accessibility guidelines “in keeping with the Accessibility for Ontarians with Disabilities Act Standards”. Currently there is no legislation under the AODA addressing this, so the Region is not sure how one could be developed “in keeping with the AODA”. Please revise the wording.
- On page 44, Recommended Action 9.4, the document cites the City of London’s Facility Accessibility Guidelines (FADS) document in the comment section. There is concern expressed within the industry that this document may fall short of the Built Environment Regulation (which is still to be released) and by following it, some municipalities may have to “catch up” to the regulation when it is released, raising cost implications.
- On page 45, Recommended Action 9.5 speaks to working with the Region to provide builders and contractors with education on the AODA. The Region feels that it should be the responsibility of the Province to educate the private sector on their own legislation. However, the Region’s policies and plans will reflect the requirements so that builders and contractors have to comply to be awarded specific contracts.
- The draft housing strategy specifically addresses housing for women who are not victims of violence, but what about for women who are victims of violence?
- Throughout the draft housing strategy, “disabilities” is referred to in the context of aging seniors and the resulting limitations that accompany aging. There are many people born with disabilities and the draft housing strategy should address the needs of these people as well.

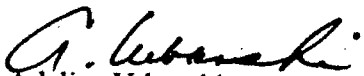
Also, a few editorial fixes were found:

- Page 3, 11th line from the end where it reads “*The Town has recently completed a Integrated Leisure Master Plan*”, the word ‘a’ should be replaced with ‘an’.
- Page 3, 10th line from the end of the page, missing apostrophe in “Town's” goals.
- Page 7, footnote on the 4th line OW shelter allowance, the word “benefit” is misspelled.
- Page 9, the bullet on the top right side is misplaced in the centre of a paragraph
- Page 11, 3rd paragraph, where it reads “*The provincial role in housing has evolved over that last decade from direct delivery...*” the word “that” should be replace with “the”.
- Page 14, first line at the top, “by” instead of “ty” type and tenure.

Thank you for the opportunity to provide comments on this important strategic document for the Markham community. This document will serve as a useful guide for the Town of Markham and other stakeholders in addressing the affordable and special needs housing requirements. We look forward to our continued involvement with this initiative.

Should you have any questions or concerns relating to our input, please contact either myself or Cordelia Abankwa-Harris, Managing Director, Strategic Service Integration and Policy Branch, at 905-830-4444 ext. 2150.

Sincerely,



Adelina Urbanski
Commissioner
Community and Health Services

AU/MK/dd

Copy to: B. Librecz, Community and Fire Services, Town of Markham
B. Tuckey, Planning and Development Services, York Region
S. Patterson, Community and Health Services, York Region
D. Rennie, Community and Health Services, York Region
C. Abankwa-Harris, Community and Health Services, York Region

18 August 2010

Murray Boyce
Senior Project Coordinator
Town of Markham
101 Town Centre Dr
Markham ON L3R 9W3

Dear ~~Mr. Boyce~~:

Murray

**Re: Comments – Town of Markham Affordable and Special Needs Housing Strategy
Draft Discussion Paper**

In response to your request, we appreciate the opportunity to provide comments with respect to the Town of Markham Affordable and Special Needs Housing Strategy Draft Discussion Paper. The Paper is one component of a Town study to review the relevance of the 2003 Affordable Housing Strategy, and to put forth a new Affordable and Special Needs Housing Strategy. The study aims to identify key issues related to the planning and provision of affordable and special needs housing and assess the Town's role regarding the provision of such housing.

As per our understanding, the Paper is a culmination of statistical analysis, background literature review, interviews, surveys, and a stakeholder workshop. The Paper generally examines the policy context, demographic trends, and affordability data, and proposes over 60 recommended actions supporting ten affordable and special needs housing goals.

The environmentally sustainable, financially prudent, and socially equitable development of housing, especially as it relates to affordable and special needs housing, is of significant interest to York Region. At the Regional level, the planning of affordable and special needs housing is the joint responsibility of both the Planning and Development Services and the Community and Health Services Departments. Although our comments on the Paper were jointly prepared and reviewed, due to time constraints, the Community and Health Services Department will send its comments to you separately. Accordingly, on behalf of York Region's Planning and Development Services Department, we offer these comments for your consideration:

1. The Paper's Recommended Actions are generally consistent with the York Region Official Plan, including the Plan's housing policies as contained in Section 3.5.
2. We are encouraged by the Recommended Actions that explore and develop affordable and special needs housing policies, such as alternative design standards (Recommended Action 2.1, page 18) and usage of Planning Act provisions for community benefits (Recommended Action 3.6, page 25). We suggest that these Recommended Actions also include the development and adoption of specific implementation guidelines, where

possible, to support the practical usage of the policies to be developed. For example, we suggest that implementation guidelines would be valuable to support the recommended housing target guidelines in Appendix A (page 51), with reference to the proposed 15 percent rental target guideline for social housing units.

3. We are also encouraged that the Paper recognizes the role and importance of Markham's urban growth centres for affordable and special needs housing policies and development. We would prefer, however, if the various references to the Langstaff Gateway area in the Paper were expanded to encompass the greater, unified Richmond Hill/Langstaff Gateway Urban Growth Centre (RH/LG UGC).

Following the Shared Principles, which the Towns of Markham and Richmond Hill and York Region mutually agreed to in the RH/LG UGC Planning Coordination Process, we encourage the Town to take a holistic view of the RH/LG UGC. The Town could jointly explore opportunities and develop policies and implementation guidelines to achieve a complete, diverse, and integrated centre that serves as a focal point in the Region for housing and takes into account a wide range of income levels and demographics.

4. On page 10, the Paper highlights some important stakeholders and their roles in responding to the housing needs of residents and creating more viable and complete communities. We suggest that, in addition, Markham's residents and businesses are two stakeholder groups whose roles should be briefly highlighted as well.
5. On page 13, Goal 10 of the Paper lists partnerships under the heading of special needs housing. We suggest that the facilitation of partnerships is a useful means of implementing policies and managing affordable housing development. As such, Goal 10 should be a joint goal under both the special needs and affordable housing headers.
6. Recommended Actions 2.2, on page 18, and 3.3, on page 24, suggest an annual affordable housing target of 25 percent of new housing units be adopted. We suggest that, consistent with Policies 3.5.6 and 3.5.7 of the York Region Official Plan, the annual target should include wording that suggests the 25 percent figure is a minimum target.
7. Recommended Actions 2.2 and 3.3 also call for tenure-based targets for new affordable housing units: a minimum of 20 percent ownership and a minimum of 80 percent rental, respectively. We are unclear if this signifies a fixed 20 percent ownership and 80 percent rental target, or if the minimum 80 percent rental target takes precedence over the 20 percent ownership target, as suggested in Appendix A (pages 50-51).
8. Recommended Actions 2.5, on page 20, and 3.9, on page 26, propose to provide conditional grants for development charges and reduce parkland dedication fees for affordable housing development. We suggest that such a grant and fee reduction program be structured to provide benefits for the development of affordable housing units beyond a certain and specified minimum unit threshold, to support development initiatives that make a significant contribution to meeting the Town's housing needs.

9. Recommended Action 2.8, on page 21, promotes, as part of an education campaign, the development of alternative forms of affordable home ownership models. We suggest that two additional models be examined and promoted, in addition to the models listed:
 - a. Community land trusts, which are agencies that acquire and hold land for affordable housing, and are commonly used in British Columbia, Alberta, and in the United States; and,
 - b. Life lease tenures, which typically lease the use of housing units to seniors without transferring ownership, and are used in Ontario and Western Canada.
10. Recommended Action 3.1, on page 23, calls for the approval of the Strategy for Second Suites, to permit second suites in single- and semi-detached dwellings throughout Markham. We continue to encourage all of York Region's local municipalities to permit secondary suite development as-of-right where appropriate.
11. Recommended Action 3.8, on page 26, calls for the Town to work with the private sector and York Region to encourage the location of affordable and special needs housing in proximity to rapid transit routes. We suggest that this work include the identification of preferred locations for affordable and special needs housing along the Yonge Street and Highway 7 Regional Corridors.
12. Recommended Action 3.16, on page 28, recommends that the Town work with York Region to prepare an education program highlighting the advantages of incorporating affordable housing into communities. We suggest that the Town also work with non-profit housing and development industry stakeholders in preparing this program.
13. Recommended Action 3.17, on page 28, recommends that the Town work with the private sector to explore affordable housing development options. We suggest that the Town also work with non-profit housing stakeholders with significant experience in developing affordable housing units and integrating these units into larger residential communities, such as the Toronto Community Housing Corporation.
14. Recommended Action 6.4, on page 36, recommends a workshop to explore best practices in family housing for high-density areas, and to share techniques on creating ground level family housing options. The Town may wish to include in this workshop, in addition to builders and developers, the City of Toronto's Affordable Housing Office.

In addition, recognizing the constraints and difficulty of implementing this, if it is possible, we suggest that a representative knowledgeable with the family housing practices and techniques developed and used successfully by the City of Vancouver, British Columbia, would be an asset for the workshop.
15. In addition to the Recommended Actions contained in the Paper, we encourage the Town to explore and investigate:

- a. Methods and guidelines for the comprehensive planning and development of affordable and special needs housing at the secondary and tertiary (i.e. precinct) plan levels for the Regional Centres and new community areas;
- b. The usage of community improvement plan provisions (as defined by Section 28 of the Planning Act) for affordable housing development, with reference to land acquisition and housing grants and loans, for potential use in areas such as Markham's urban growth centres;
- c. The usage of Committee of Adjustment conditions in decision provisions (as defined by Section 45(9) of the Planning Act) to acquire affordable housing units as a condition of approval for variance applications dealing with residential development, as practiced by the City of Toronto; and,
- d. Opportunities and challenges for modular and/or manufactured housing construction in Markham, as a means of affordable housing development.

Overall, we commend the Town of Markham's progress with the Affordable and Special Needs Housing Strategy. The Draft Discussion Paper is a comprehensive, progressive, and thorough examination of Markham's affordable and special needs housing needs and actions. We look forward to working with you, and are confident that the finalized Strategy will successfully guide the Town's affordable and special needs housing policies and housing unit development.

Building on our common goals and interests for affordable housing, the Strategy is a great opportunity for collaboration between York Region and the Town.

Should you have any questions or comments, please feel free to contact me by phone at 905-830-4444 ext. 1525, or by e-mail at john.waller@york.ca.

Sincerely,



John Waller, MCIP RPP
Director, Long Range and Strategic Planning Branch

JBW/ah

Attachment

Copy to: Heather Konefat, York Region Planning and Development Services Department
Cordelia Abankwa-Harris, York Region Community and Health Services Department
Sylvia Patterson, York Region Community and Health Services Department



August 9, 2010

Town of Markham
Markham Civic Centre
101 Town Centre Boulevard,
Markham, Ontario, Canada
L3R 9W3

VIA MAIL AND EMAIL

Attention: Rob Jankowski

Dear Community / Committee for Affordable and Special Needs Housing Strategy:

In follow-up to our submissions, dated May 14, 2010 please find our response to the Draft Discussion Paper ("DDP").

DDP, page 5 – Defining Affordable Housing

Renter affordability for Markham is defined as "a unit for which the rent does not exceed 30% of household income for the renter households within incomes in the lowest 60% of the renter income" ... "this represents renter households earning less than \$39,800 (approx 1711 households or 20% of households in 2006) and a maximum monthly rent of \$997.

OUR RESPONSE: It should be noted that a single person on Ontario Works ("OW") has an income of less than \$7,500.00 per year and a single person receiving Ontario Disability Support Program ("ODSP") has a yearly income of \$12,000.00 per year. This is a *significant* amount away from \$39,800 (top end of the renter affordability category), which therefore has a significantly greater impact on the affordability of a monthly rent at \$997.00.

DDP, page 5

"It is recognized however that some households do and will choose to spend more than 30% of their gross income on housing in order to enter and remain in the Markham housing market." (Also discussed at page 29, Goal 4)

OUR RESPONSE: Choices of this nature are not "free" choices. In fact, many low-income recipients are frequently forced to pay more than 30% of their income on rent just to ensure a roof is over their head. Furthermore, many low-income individuals "choose", or rather, are forced to remain in their community for many reasons. In particular, remaining in a familiar community with a group of supports (i.e. child's school and friends, doctor's, social networks, etc) is a means of survival. This is increasingly the case for tenants with mental health concerns who require these supports. Moving to a different community and having to find new supports can be extremely traumatizing and taxing on mental health suffers with low incomes.

DDP, page 6 – Housing Continuum

“Generally speaking, as household income increases, and households move along the continuum from left to right, and increased number of housing opportunities become available within the market.

...Similarly, as a renter moves from a smaller unit to a larger unit, the smaller units are still within the affordability level for that household.”

OUR RESPONSE: Although this may be true for households where there is increasing income, the continuum model assumes that this will be the typical “ride” of a renter in Markham, which is sadly not the case. Many households do not enjoy increased incomes, but are on fixed monthly incomes, such as recipients of OW, ODSP, Canada Pension Plan, Old Age Security, etc. These households, therefore, do not take an active part in the continuum but stay locked in at the *most* affordable rental options, which in most cases are simply not “affordable” at all.

DDP, page 8 – Housing Continuum – 1st and 2nd Income Deciles

“There are very few affordable housing options for households in this category. With the exception of some smaller private rental units (i.e. one-bedroom units), households in the category rely on social housing as well as emergency, transitional and supportive housing.”

OUR RESPONSE: Unfortunately, this statement gives an unclear picture about where low income renters in Markham are turning for housing. Many renters are forced to live in sub-standard “illegal” basements or second suites. Homeowners who have recognized the financial benefit of a tenant apartment in their basement are renting to individuals in Markham who cannot afford housing elsewhere. While this fortunately assists with the affordable housing crisis in Markham, it is a double-edged sword because tenants in these private second suites do not enjoy the protection of the law to enforce their rights, specifically with respect to maintenance and repair issues, as currently these suites have not been legalized by Markham and therefore no by-law exists. Shockingly, Markham is one of the few remaining municipalities without a complete property standards by-law. This means landlords are not held accountable by Markham for inferior and sub-standard conditions within a rental unit. As a result, Markham tenants must turn to Provincial standards and the enforcement unit rather than have protection from their own municipality. In doing so, they also face the risk of eviction.

DDP, page 11 – Role of Partners – Not-for-Profit Sector

OUR RESPONSE: The Community Legal Clinic of York Region is a not-for-profit organization and plays an extremely active role in advocating for low income tenants and providing public legal education workshops, as well as community development seminars on the topic of affordable housing, and therefore the Not-for-Profit Sector list should accurately include legal advice, legal education and advocacy.

DDP, page 15 – Policy 1.1

“Further, that an annual target of 25% rental and 75% ownership also be adopted for new housing development.” (With a strong recommendation that the majority of the new rental units be affordable housing).

OUR RESPONSE: Are these annual targets in keeping with the current need and the estimated growth of need over the years to come? What is the basis for determining the 25%/75% split?

DDP, page 22 – Figure 4

OUR RESPONSE: This figure identifies the OW shelter allowance as \$620.00 and the ODSP shelter allowance as \$791.00. These numbers are extremely *inflated and inaccurate*. The most recent numbers provided by the Ministry of Community and Social Services indicate that a single person on OW will receive up to a **maximum** of **\$356** shelter allowance, and a single person on ODSP up to a **maximum** shelter allowance of **\$454**. The shelter allowances as outlined in the figure more accurately reflect a family size of approximately four people, and therefore this should be clearly identified in the figure.

DDP, page 31 – Action 4.3

“Support Region in identifying ways to intensify existing social housing sites, including Housing York Inc.”
– Context: “Importantly, the intention of this action is not to tear down existing social housing, but rather to use any available land to intensify existing sites.”

OUR RESPONSE: It should be noted that in some cases the existing social housing sites are deteriorated and overrun with pests and mould, thereby requiring either extreme gutting of the premises or tearing down.

Additional Notes:

Our initial submissions were an introduction to the issue of second suites in Markham. In follow-up to those thoughts, we would like to expand on the benefits and point out that there is virtually no downside to the legalization of second suite apartments. The legalization of second suites is a win/win/win/win situation. Tenants, homeowners, the municipality and the environment all benefit from such a by-law. For tenants, the benefits include safe, affordable housing with greater rental options. Homeowners can enjoy the benefits of extra financial “breathing room”, the ability for new homeowners to carry a mortgage, and increased marketability or resale value. Markham will benefit from an increase in its affordable rental housing supply without sinking large amounts of funding into new construction projects; the municipality will also enjoy greater control over the inspection of these units. And finally, the environmental effects are favourable in that Markham’s precious and beautiful existing green space is preserved through compact development and efficient land use.

We look forward to the ongoing process and the final outcome of your study. Please contact us if you wish to discuss any of the above points further.

Yours truly,

COMMUNITY LEGAL CLINIC OF YORK REGION

Kandace Bond Wileman
Barrister and Solicitor



York Region

Alliance to End HOMELESSNESS

510 Penrose Street
Newmarket,
Ontario L3Y 1A2

August 12th 2010

Dear Murray Boyce:

TOWN OF MARKHAM

Affordable and Special Needs Housing Strategy
Draft Discussion Paper - Prepared by SHS Consulting

We commend the Town of Markham for their initiative in the development of an Affordable and Special Needs Housing Strategy. As you consider this report, the stakeholder workshop and feedback in the development of the Town's actual Affordable and Special Needs Housing Strategy, we offer the following comments:

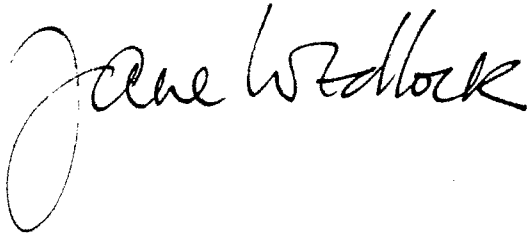
- There is a need to strengthen the narrative on why housing for all matters to the health and wellbeing of the entire community – e.g. a “branding” component that would inform all education /community engagement about affordable housing.
- The report as it is currently presented lacks a “face”. While rich in statistics, the human component of “people on low and moderate incomes” does not sufficiently speak to the variety of people who are impacted in our communities. We need a better understanding of who they are.. This is critical for any education efforts that speak to the importance of appropriate housing supply for “complete communities”. People need to see themselves/their families/their parents/their young people as benefitting from more affordable housing stock.
- There is also an opportunity to strengthen the emphasis on links to environmental sustainability – notion of “complete communities” e.g. reducing the need for renters to commute in.
- Recognizing that homelessness is the responsibility of York Region in terms of service system management, there is still a need for close collaboration with area municipalities and the community. The fact that so many people are on the waiting list for affordable housing in Markham and over 3500 households (2006) are spending over 50% of their income in rent speaks to “severe affordability” issues and places them in core housing need. This puts them at significant risk of homelessness – even though there are very limited homelessness related services in Markham. *The consequences of not providing an appropriate housing mix* are very significant and deserve stronger emphasis.
- Page 30 indicates the waiting list for social housing to be 10 years – for singles, it is likely to be much longer. There is also no reference to SRO's (single room occupancy)

dwellings. The reality is, people are renting rooms – an affordable housing strategy should take this into account.

- Page 38 – the photographs are out of date. There is now a 60 bed family shelter (Leeder Place). Blue Door Shelters or York Region would have more up to date photographs.
- Implementation of any strategy will involve the development of partnerships as indicated on Page 10. We hope the Town of Markham will consider the York Region Alliance to End Homelessness a key partner in supporting the development and implementation of this strategy.

Thank you for this opportunity to comment on this document. We look forward to future opportunities to support the Town of Markham in this important initiative.

Yours truly,

A handwritten signature in black ink, reading "Jane Wedlock". The signature is fluid and cursive, with the first name "Jane" written in a larger, more prominent script than the last name "Wedlock".

Jane Wedlock
Executive Director – Community Strategist

York Region Alliance to End Homelessness
A catalyst for collaborative solutions to homelessness and poverty in York Region



"STANDING UP FOR UNIONVILLE"

www.unionvilleratepayers.com

August 5, 2010

RE: AFFORDABLE AND SPECIAL NEEDS HOUSING STRATEGY

Draft Discussion Paper July 8 2010

1. What is the process for incorporating an affordable housing strategy into Town planning? After the draft strategy document is circulated and comments received, what happens next?
2. What is the role of York Housing Inc. in development and execution of this strategy in Markham?
3. Given the proposed concentration of lower priced and rental units in Markham Centre and Langstaff Centre serving the "social housing" sector, does the Town have any concerns that this could lead to a concentration of "poorer" people such that social problems could arise? Recent press has indicated that social problems in Flemingdon Park in Toronto, for example, could well be the result of urban planning putting all the "poor" people together (resulting in a lack of willing service providers) as opposed to spreading them over a wider area.
4. What best practices, or input from municipalities taking a lead in this field, have been taken into account in the proposed strategy?
5. Does the Town have the necessary levers to be able to enforce the strategy? Specifically, is Bill 58 required to enable the Town to enforce rental zoning? When is Bill 58 expected to pass into law? Given the overall number of rental units in Toronto for example, is declining, how will the Town meet the proposed targets for rental units?
6. Given the stated need in the Town for affordable housing (Page 49 "60% of all new housing units built would need to be affordable to low and moderate income households"), how will this need be addressed by this strategy given that the strategy only calls for 25% of new housing to be "affordable" ? What are the other implications for the Town's future given this misalignment between current needs and future plans?

7. What is the impact of this strategy, and how will it be incorporated, in current ongoing development plans, for example for Beckett Farm and Markham Centre?
8. Does the Town have any concerns about the proposal to provide loans to enable more people to afford ownership? Could this incent more people to get into debt they cannot handle? Should the taxpayers in Markham be responsible to underwrite such loans?
9. Is there a better term for rental units renting for below \$1008 than "social housing"? There are many dwellings in Markham with rents under \$1000. These may be rented by individuals at market rates, eg students, singles, seniors. Doesn't "social housing" mean rent-geared-to-income or other subsidies? This would avoid confusion and negative reaction.
10. Do you have any thoughts on public education ? As evidenced by the secondary suites debate, public education is vital.

August 19, 2010

Via Email

Murray Boyce
Town of Markham
Markham Civic Centre
101 Town Centre Boulevard
Markham ON L3R 9W3

Dear Murray Boyce:

Re: Town of Markham's Draft Affordable and Special Housing Needs Strategy Discussion Paper

We are the Group Manager and Trustee for the Markham Centre Landowners Group (MCLG). We are writing to you on their behalf to provide comments as it relates to the *Town of Markham's Affordable and Special Needs Housing Strategy Draft Discussion Paper* (Affordable Housing Policies). The MCLG is made up of various landowners generally bound by Warden Avenue to the west, 407 to the South, Highway 7 to the north and the CN rail tracks to the east.

According to the discussion paper, the Town of Markham's Affordable Housing Policies were prepared in response to the need for more affordable housing in Markham. All public and agency comments on the Affordable Housing Policies are due by August 20, 2010. Please accept this letter and attachments as the MCLG's formal comments in this regard.

The MCLG has concerns with a number of the policies and actions suggested in the discussion paper. These concerns primarily focus on the manner in which the Town of Markham is proposing to mandate affordable housing policies on the development community. It is our position that the Town should focus its attention on lowering development charges, regulations, fees and land costs as a means to lower the cost of housing in Markham. Simply placing additional costs, mandating targets and requiring developers to subsidize a certain number of units to achieve affordable housing policies will only increase the cost of housing for non-subsidized units and does not address the larger housing affordability concern. We do, however, support those policies providing for an incentive based approach that focuses on promoting affordable and accessible housing in a variety of types and forms.

Please find attached to this letter Appendix A, which indicates more precisely the proposed policies the MCLG have concerns with.

We will provide comments on any changes to other Town by-laws, plans, studies, or guidelines that are impacted by the proposed affordable housing policies.

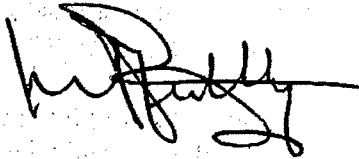
Furthermore, we understand the City of Toronto has a joint program with the Federal and Provincial governments that provides a combination of forgivable loans, tax forgiveness and the waiving of fees and development charges to developers who provide affordable housing. We believe a program such as this which is based on incentives and voluntary participation rather than mandated policy targets is a superior method of delivering affordable housing. As such, we would like to meet with

staff to discuss the benefits of this program and our comments on Markham's draft proposed policies in greater detail.

If you have any questions regarding the above, please do not hesitate to contact the undersigned.

Yours very truly,

MARKHAM CENTRE LANDOWNERS GROUP INC

A handwritten signature in black ink, appearing to read 'Myron P. Pestaluky', written over a horizontal line.

Mr. Myron P. Pestaluky, P.Eng.
Group Manager and Trustee

Encl: Appendix A – MCLG Comments

CC: Mr. Jim Baird, Commissioner of Development Services – Town of Markham
Members of the MCLG

Appendix A: MCLG Comments

Item No.	Item Content	Markham Centre Landowner Group Comment
Policy 2.2	<i>Adopt, as part of the Official Plan update, a Town-wide affordable housing target of 25% of new housing units, including a minimum of 35% of new housing units in Markham Centre, Langstaff Gateway and key development areas be affordable. Further, that a minimum of the 20% of new affordable housing units be ownership.</i>	<ul style="list-style-type: none"> • The MCLG has concerns with mandating this policy. • What standard will be applied to determine if the unit is "affordable"? We note that the Region's OP policies in this regard are based on a Region-wide average. We provided comments to the Region in this regard and do not support this position. • Who represents a "pre-qualified" buyer for affordable housing? Who will manage and over see this program? • We note that this policy and policy 3.3 contradict each other in that both policies cannot have minimum targets of 20% ownership and 80% rental, respectively. As currently structured, these two policies provide absolutely no flexibility. • We foresee difficulty in implementing this policy in high-rise developments such as Markham Centre. • This policy requires further study.
Financial 2.5	<i>Defer development charges and parkland dedication fees in exchange for the development of affordable ownership housing. Deferment of fees would remain in effect as long as property remains affordable</i>	<ul style="list-style-type: none"> • The MCLG generally supports incentive based approaches such as this. However, this policy must be registered as a notice on title in order to be enforceable.
Education 2.8	<i>As part of a comprehensive education campaign, promote, within the development community, the development of alternative forms of affordable home ownership models such as rent-to-own and home ownership cooperatives.</i>	<ul style="list-style-type: none"> • MCLG supports this policy in so far as it being optional, it is elective, and not prescriptive. • The implementation of such a policy provides challenges and requires further discussion.

Appendix A: MCLG Comments

Policy 3.3	<i>Action 3.3: Adopt, as part of the Official Plan update, a Town-wide annual affordable housing target of 25% of new housing units, including a minimum of 35% of new housing units in Markham Centre, Langstaff Gateway and key development areas be affordable. Further, that a minimum of 80% of new affordable housing units be rental.</i>	<ul style="list-style-type: none"> • The MCLG position is that this policy should not be mandatory (see policy 2.2 comments). The municipality should focus on lowering land costs, development charges and fees as a means of providing affordable housing. • Mandating rental units to 80% is not supported.
Policy 3.6	<i>Expand the use of community benefits, for the use of approving density bonusing within the Official Plan to include the provision of affordable and special needs housing including housing for seniors.</i>	<ul style="list-style-type: none"> • The MCLG supports this approach and believes it should be coordinated with Section 37 policies in the Official Plan.
Policy 3.7	<i>Investigate adding social/affordable housing as a charge under the Town's development charges by-law.</i>	<ul style="list-style-type: none"> • There is no provision in the Development Charges Act which gives municipalities the authority to include a charge for affordable housing under the Town's development charge by-law. We do not support this policy.
Financial 3.9	<i>Develop a policy to provide conditional grants for development charges and reduced parkland dedication fees in exchange for the development of affordable rental housing.</i>	<ul style="list-style-type: none"> • The MCLG reiterates the difficulty in implementing this policy in high rise developments, particularly in the differentiation between the types of units. It is unreasonable to charge market vs. subsidized rates for essentially the same unit.
Policy 6.1	<i>Encourage a mix of housing within the Urban Growth Centres and key development areas that can meet the needs of families, including ground related housing (i.e. townhouses, stacked townhouses, small apartments buildings, low rise apartments).</i>	<ul style="list-style-type: none"> • How is this to be accomplished in Markham Centre where policies and plans do not support lower densities? The MCLG believes this policy runs counter to the Markham Centre Secondary Plan. • Further discussion is required.
Financial 6.3	<i>Examine the feasibility of lowering development charges for multi-residential dwellings suitable for families within the Urban Growth Centres.</i>	<ul style="list-style-type: none"> • The MCLG is supportive of this approach, however further discussion is required regarding implementation.
Financial 8.2	<i>Evaluate the feasibility of providing conditional grants for development charges and parkland dedication fees</i>	<ul style="list-style-type: none"> • The MCLG is supportive of this policy but reiterates the requirement for clarification on how this is

Appendix A: MCLG Comments

	<i>and other financial mechanisms for new housing developments that provide a minimum of 5% of their units for those with special needs.</i>	implemented in high rise development.
Financial 8.3	<i>Investigate adding special needs housing as a charge under the Town's development charges by-law.</i>	<ul style="list-style-type: none"> • See policy 3.7 comments.
Policy 9.1	<i>As part of the development of special needs housing targets, include an annual target for modified/accessible units.</i>	<ul style="list-style-type: none"> • The MCLG does not object to this policy but it is our view the monitoring agency must be the Town.
Policy 9.2	<i>As part of the next Official Plan update, include a policy to encourage accessible features in new housing development.</i>	<ul style="list-style-type: none"> • The MCLG does not object to this policy, but reserves the right to participate in and comment on any changes to accessibility standards.