

CARP members are concerned about affordable housing.

In our May 2017 survey of 5,182 members, 79% rated access to housing as very important or extremely important. Sharp increases in the number of seniors using food banksⁱ in 2018 indicates that seniors are struggling to obtain affordable shelter, which results in insufficient funds to pay for food.

The Ontario Government needs a new vision for housing seniors that includes innovative housing models, support for municipal zoning flexibility, and building standards for accessible housing for seniors in urban, rural and Indigenous communities.

CARP has four recommendations to improve housing supply for older, and indeed all, Ontarians.:

1. Support the remodelling of large existing homes into co-housing units.
2. Discourage real estate investors from leaving housing stock empty.
3. Limit the use of rental housing stock as short-term accommodations, such as Air BNB rentals.
4. Increase accessible housing through upgraded building codes that require developers to build for their client's lifetime needs.

We have provided more information about each of these recommendations in the attached submission. We would be pleased to discuss our recommendations with you or provide any further information you require.

Thank you for the opportunity to provide input.

Sincerely,

Wanda Morris
Chief Advocacy and Engagement Officer

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Chief Public Policy Officer

1. Support the remodelling of large existing homes into co-housing units.

Increasing housing supply is one way to address the needs of Ontarians. Another is to increase resident density, i.e. increasing the number of individuals living in our existing housing stock.

Many CARP members find themselves living in properties larger than they need, while struggling to make ends meet financially. Downsizing is an option for some, but it does not necessarily result in significant cost savings and may lead to social isolation.

An innovative solution is the building or remodelling of “single-family” detached homes into homes which can be jointly owned by a small number of individuals (say 4 – 6) as joint owners or tenants in common. Unlike roommates who typically only have a private bedroom, purpose built co-housing units for these joint owners / tenants typically includes private bathrooms, and living / work spaces too. Individuals thus share common space in the home while maintaining their own living space too.

Not only does this reduce housing costs for the owners / occupants, but it also addresses the need of seniors for social inclusion. It can lead to further cost savings as such a model facilitates the delivery of homecare services.

While CARP has supported one such projectⁱⁱ the developer was compelled to overcome resistance from the neighbourhood and defend the project in a municipal hearing even though the project did not require a change in zoning.

2. Discourage real estate investors from leaving housing stock empty.

Paris France and Vancouver B.C. have introduced controls to limit or tax empty housing stock. Other jurisdictions are studying this issue. Reducing the number of empty homes would not only improve the supply of housing but also provide a lift to neighbourhoods that are negatively impacted by empty homes.

The 2016 census data from Statistics Canada indicated that Toronto has more than 99,000ⁱⁱⁱ empty homes. A vacancy tax does not hurt investors who rent out their

properties; it only discourages investors from viewing housing stock as a commodity and investing without renting the property out.

3. Limit the use of housing stock as short-term accommodations, such as Air BNB, to home sharing, rather than as a commercialized, short-term rental business.

The rise of home-sharing programs such as Air BNB have significantly impacted rental stock. In *Short Term Cities*,^{iv} McGill Professor David Wachsmuth notes that Air BNB has removed 4,890 units from Toronto's housing stock.

Priority for housing must go to local residents; restrictions on property-sharing coupled with enforced are critical tools to return these properties to the local market.

Wachsmuth and his fellow researchers make three recommendations for better AIR BNB regulation which CARP supports as in keeping with the original notion of "home sharing":

1) One host, one rental

Cities should require home sharing hosts to actually be sharing their homes — allowing residents to rent out their own homes while they are out of town, or to rent out a spare bedroom — while refusing to allow large - scale commercial operators to convert multiple homes into de facto hotels. If each host is only permitted to list a single unit — their own home — then short -term rentals will cease to come at the expense of residents' long-term housing needs.

2) No full-time, entire-home rentals:

Hosts should not be permitted to rent their homes for a large amount of the year, regardless of if that home is a primary residence or not. Different cities have set different thresholds for full-time cut-offs, usually between 60 and 90 days per year, but some threshold is necessary for limiting short-term rentals to actual home sharing.

3) Platforms responsible for enforcement:

Even the best-conceived regulatory principles will flounder if they cannot be properly enforced. And international evidence demonstrates that short-term-regulations will fail to achieve their intended effect unless Airbnb and the other platforms are required to proactively enforce them. For example, in the absence of cooperation from the platforms, a city seeking to enforce an annual limit on 60 days of rentals would need to conduct 61 separate inspections to identify a violator. Airbnb, on the other hand, can modify the online platform to disallow further rentals from a listing that has reached its 60-day limit.

4. Increase accessible housing through upgraded building codes that require developers to build for their client's lifetime needs.

It is a truism in the construction industry that it is less costly to build to a standard than to meet that standard retroactively. For example, efficient heating and cooling systems, and features that provide for accessibility, such as walk in showers, or wider corridors, are far cheaper if incorporated into original design.

These features will save homeowners money over time, and may even be the difference between being able to stay in their homes or having to move. However, new homes in Ontario are not required to be built for accessibility and developers are not doing so on their own initiative.

All new homes should be required to be built for accessibility according to the Universal Principles of Design for accessibility. The practical measures as recommended by the Canadian Mortgage and Housing Corporation are included as Appendix A to this submission.

While this change would not provide an immediate solution, it is long overdue and will gradually increase the stock of accessible housing available to buy and rent.

Recommendations to Improve Access to Housing for Ontario Seniors

The Canada Mortgage and Housing Corporation (CMHC) has listed recommendations to help developers implement the principles of Universal Design and facilitate ageing in place.^v CARP strongly supports the use of these principles in all new housing stock.

Throughout the home

- Allow space for wheelchairs and walkers to move freely.
- Install lever-style door handles and faucets.
- Use non-slip flooring.
- Install smooth, low thresholds.
- Include good, non-glare lighting.
- Install windows with low sills.
- Insulate exposed pipes.

Entryway

- Position the entry near parking.
- Use ramps and landings, or well-designed steps.
- Install a bench or ledge to set things down while opening the door.
- Add a covered sitting porch, canopy or overhang.

Living room and dining room

- Design the space for a range of activities, such as watching television, reading, entertaining, playing table games and dining.
- Allow for flexible furniture layouts.
- Make the most of natural light and outdoor views.

Kitchen

- Install removable lower cupboards.
- Use adjustable-height counters with rounded corners.
- Place cabinets, appliances, switches and outlets within easy reach.
- Create adjustable storage and place short-term storage between knee and shoulder heights.
- Use colour contrast on outlets, cabinets and counters.
- Install hands-free faucets.

Bedrooms

Recommendations to Improve Access to Housing for Ontario Seniors

- Design the space for varied uses, such as crafts, hobbies and reading.
- Provide bedside storage.
- Place controls for lights, television and telephone within reach of the bed.

Bathrooms

- Locate the full bathroom on the ground floor.
- Install an adjustable-height vanity and removable lower cabinets.
- Use a step-in tub with a seat and a roll-in shower with an adjustable-height showerhead.
- Install temperature-limiting controls and make them accessible from both inside and outside the tub and shower.
- Reinforce walls to support grab bars.
- Add a closet or cabinets that can be used later to expand the room.

Storage spaces

- Leave space to store wheelchairs, walkers and electric scooters.
- Provide a place to recharge scooter batteries.
- Avoid high or very low shelving.
- Ensure any storage area outside of the unit is lockable.

Laundry room

- Locate laundry areas on the same floor as the living area.
- Put switches and plugs within easy reach.
- Install front-loading machines.

Patio and balcony

- Ensure a wheelchair can fit through the doorway.
- Plan for a minimum depth of 1.8 m (6 ft.).
- Add lighting and an electrical outlet.
- Use a railing that doesn't block the view while seated.
- Ensure doors are secure.

Recommendations to Improve Access to Housing for Ontario Seniors

ⁱ According to the Ontario Association of Food Bank's 2018 Hunger Report: *"the number of seniors accessing hunger-relief services [increased] more than 10 percent [in 2018] over the previous year, a rate nearly three times faster than the growth of Ontario's senior population"* <https://oafb.ca/wp-content/uploads/2018/11/Hunger-Report-2018-Digital.pdf> Accessed January 24, 2019

ⁱⁱ CARP's Barrie chapter sponsored a co-housing project. For more information see Muggeridge, Peter, *The Cohousing Revolution* in January 22, 2018 issue of Zoomer Magazine.

ⁱⁱⁱ Calculated as total homes less total occupied homes as reported by Stats Canada. <https://www12.statcan.gc.ca/census-recensement/2016/dp-pd/prof/details/page.cfm?Lang=E&Geo1=CMACA&Code1=535&Geo2=PR&Code2=35&Data=Count&SearchText=toronto&SearchType=Begins&SearchPR=01&B1=All&TABID=1> Accessed January 24, 2019

^{iv} Short Term Cities, Airbnb's impact on Canadian housing markets, Accessed January 24, 2019 <http://upgo.lab.mcgill.ca/airbnb/Short-term%20Cities%202017-08-10.pdf>

^v <https://www.cmhc-schl.gc.ca/en/developing-and-renovating/accessible-adaptable-housing/universal-design-in-new-housing> Accessed January 24, 2019