

DRAFT 15 May 2009



Ken Hetherington
Planning Division
City of Peterborough
500 George Street North
Peterborough, ON K9H 3R9

Dear Ken:

The Affordable Housing Action Committee welcomes this opportunity to comment on the City of Peterborough's Official Plan Amendment. We wish to advocate for the low and very low-income households who are striving to live decent, safe and productive lives in Peterborough; we want to promote their right to affordable housing. Motivating our concern is the knowledge that of the 12,650 rental households in the city, 6,385 are paying more than 30% of their gross household income on housing costs.

In reviewing the Official Plan amendment we found several areas where we would recommend clarification or expansion. You will find that our comments surround the definition of affordable housing, an addition to the plans for energy that will help to increase affordability, additional clarity around the scope of the monitoring and enforcing needed to sustain the plan, and a need to increase the percentage of affordable units to be built, with a target for increasing housing supply for those with the lowest income levels.

The need for affordable units was identified in 2003 in the "Needs Analysis and Strategies" report as amounting to just over 200 units per year for households with gross incomes below \$30,000. Since then, the community has produced over 400 new rental units, but not all of these were truly affordable. We are continually falling behind and running up a substantial deficit. The Official Plan needs to recognize this deficit and contain policies to encourage increased production targeted to those in greatest need.

As ever, AHAC appreciates the attention that is paid to affordable housing needs in the City and County and we remain committed to assisting in providing opportunities to increase its supply.

Sincerely,

John Bennett
Chair, Affordable Housing Action Committee

AHAC Feedback on City of Peterborough OP Amendment
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Section 2.4 – Growth Management Strategy

2.4.3.3 The City will strive to provide ~~40 percent~~ 25 per cent of new housing as affordable housing units to accommodate both family and non-family housing suitable to a full range of age groups, within all areas of the City.

NEW 1 40 per cent of the affordable housing described in section 4.2.3.5 shall be rental housing targeted for households who currently spend 50 per cent or more of their gross household income on rent.

Section 3.7 - Energy

NEW 2 Reduced energy consumption should be promoted by providing opportunities for energy efficient built form for housing, particularly affordable housing development or conversion.

Section 4.2.3 – Housing Production

NEW 3 The City will create a policy for affordable housing use of current and future surplus government-owned land within the City.

4.2.3.5 The City will strive to provide ~~40 percent~~ 25 per cent of new housing as affordable housing units to accommodate both family and non-family housing suitable to a full range of age groups, within all areas of the City.

NEW 4 40 per cent of the affordable housing described in section 4.2.3.5 shall be rental housing targeted for households who currently spend 50 per cent or more of their gross household income on rent.

4.2.3.7 The City shall ensure that new subdivision development shall provide a variety of housing types and densities to support the City Housing targets as outlined in the Housing Strategy as updated from time to time.

4.2.3.8 In order to monitor the provision of affordable housing, the City shall identify the remaining total development potential by secondary land use planning area and the targets for affordable housing pursuant to Section 4.2.3.5, section "NEW" 4 and the Housing Strategy. The review of individual applications for new residential development will consider the impact of the development on affordable housing targets, and approvals may be withheld until applications demonstrate progress toward targets.

- 4.2.3.9 The City shall provide for an appropriate range of housing types and densities to meet projected requirements of current and future residents by:
- a) Establishing and implementing minimum targets for the provision of housing which is affordable;
 - b) Permitting and facilitating all forms of housing, including supportive housing required to meet the social, health and well-being requirements of current and future residents, including special needs requirements.
- NEW 5 The City, through a biennial Housing Report, shall update and assess its residential land supply; evaluate housing conditions, the supply of affordable housing, development trends and densities; analyze other housing supply and demand factors; and review the compliance with the Housing Strategy.
- NEW 6 The City will undertake, biennially and periodically as need arises, a housing affordability needs analysis and strategy for addressing areas of deficiency. This will include, but not be limited to, an assessment of the following:
- i) Proportion of new ownership and resale ownership and new rental housing, by housing form, which satisfies the definition of affordable home ownership and affordable rental housing.
 - ii) Waiting list for subsidized social housing
 - iii) Homelessness data
 - iv) Demolition and conversion statistics
- 4.2.3.11 The City shall encourage the creation of secondary suites in detached and semi-detached dwellings where there is adequate parking, servicing and access to parks and amenities. The Zoning By-law will be amended to include zoning regulations which will facilitate the creation of ~~accessory apartments~~ secondary suites throughout the City.
- NEW 7 The City may establish policies to limit the demolition of residential units or the conversion of rental units to condominiums if it is demonstrated through the Housing Report that there has been an adverse impact on the supply of affordable housing through these actions.

- 4.2.3.13 The City shall undertake an Affordable Housing Strategy that includes a strategy for affordable housing, which will be updated from time to time, to establish a plan to meet the current and future housing needs of all residents. Efforts will be made to achieve the targets for the provision of affordable housing identified in the Affordable Housing Strategy.
- 4.2.3.14 ~~The City, as Service Manager for housing in for Peterborough City and County, shall encourage the retention and new supply of affordable housing in a variety of designated locations and a variety of dwelling types. The municipality shall encourage the provision of such amounts and types of housing that are necessary to meet the needs of households unable to find affordable housing through the private market. This housing may be provided by either the public or private sector, may be in conjunction with the senior government programs, and shall include housing for a range of low to moderate income households including senior citizens, low income families, singles and those requiring support services.~~
- 4.2.3.14 The City, as the Service Manager for housing for the City and County of Peterborough, shall collaborate with the County and Townships on its Housing Strategy, and on a strategy for affordable housing. The City shall maximize the use of funding from senior governments to fulfill the objectives of the strategies, and to encourage amounts and types of housing that are necessary to meet the City and County's needs for affordable housing for low and moderate income households, seniors, families and singles, and those requiring support services.

Section 9: Definitions

Affordable

In accordance with the Provincial Policy Statement (PPS):

- a) In the case of ownership housing, the least expensive of:
 - i) Housing for which the purchase price results in annual accommodation costs which 30 per cent of gross annual income for low and moderate income households; or
 - ii) Housing for which the purchase price is at least 10 per cent below the average median purchase price of a resale unit in the regional market area;
- b) in the case of rental housing, the least expensive of :
 - i) housing for which the rent, which includes utilities, does not exceed 30 per cent of the gross annual household income for low and moderate income households; or
 - ii) a unit for which the rent, which includes utilities, is at or below the average median market rent of a unit in the regional market area.