



Advant**Age**
Ontario

Advancing Senior Care

Feedback Submission – Build Canada Homes Market Sounding Guide

August 28, 2025

About AdvantAge Ontario

AdvantAge Ontario has been the trusted voice for not-for-profit senior care for over 100 years and is the only provincial association representing the full spectrum of the senior care continuum. We represent more than **500 providers** of long-term care, seniors' housing, supportive housing and community services agencies, including **98%** of all municipal long-term care homes and **83%** of all not-for-profit long-term care homes.

Our members **house seniors across the aging continuum**, by providing much more than long-term care. That includes independent rental units, supportive housing, life lease housing and other creative affordable housing options.

With a focus on **advocacy and education**, AdvantAge Ontario works on behalf of members to help all stakeholders understand what the not-for-profit approach means and what it can do for the future of senior care.

As the association of not-for-profit senior care providers dedicated to advocating for seniors' care and affordable, supportive housing, we welcome the focus on expanding non-market housing, fostering innovation in construction, and developing a more coordinated delivery model.

Introduction

The Build Canada Homes (BCH) initiative offers a generational opportunity to build seniors' housing in Ontario by catalyzing large-scale affordable housing, leveraging federal land and procurement power, and driving innovation to address the immense need for housing across the country. We commend the bold vision to confront these challenges by focusing on non-market housing and developing a more coordinated delivery model. We particularly applaud the creation of a 'Single-Window' support, which will significantly benefit not-for-profit seniors' housing providers who often face complex, fragmented funding processes.

Our members have decades of experience in the housing space, and are on the front lines of developing, building, and managing not-for-profit long-term care homes, supportive and other forms of seniors' housing across the province. It is through this lens that we provide the following recommendations to the market sounding guide to help ensure BCH has the capacity to deliver affordable, inclusive, and equitable housing for seniors.

Rising Seniors' Housing Needs in Ontario

Ontario is experiencing profound challenges associated with an aging population, and the chronic shortage of affordable seniors' housing poses a critical risk. Demographic projections consistently indicate that the demand for affordable and social housing will rise sharply as the population continues to age. From 2020 to 2024, Ontario's population aged over 65 increased from 2.5 million (17.5%) to 2.9 million (18.3%), a 14.2% increase with an annual average of 3.4%. And it is projected to increase to 4.7 million (21.3%) by 2051.

According to national statistics, in 2021, 10.7% of seniors had core housing needs, and 18.4% resided in unaffordable housing (costing 30% or more of total before-tax household income). In

GTA alone, over 50% of the senior population spends more than 30% of their income on housing needs.

As of 2021, 5.1% of persons aged 65 and over are living in poverty in Ontario. In 2022, the Canadian Institute for Health Information found that 5.7% of residents in Ontario long-term care homes potentially could have been cared for at home. This suggests that a significant portion of seniors in long-term care may not require that level of care but lack suitable and affordable alternatives.

Currently, there are around 40,000 seniors on the waiting list for long-term care beds in Ontario and most of the seniors, or 68.5% have chosen not-for-profit and municipally owned homes as their first choice for long-term care. Health Quality Ontario shows the median waiting time for a long-term care bed in the province was 121 days in 2023/24. Not-for-profit and municipally owned long-term care homes invest any surplus back into operations to continually increase the level and quality of care and services. Out of 612 long-term care homes in operation, 47.8 percent are not-for-profit, including municipally owned long-term care homes.

Without expanding the supply, the gap will continue to worsen seniors' socio-economic insecurity, increase health vulnerabilities, and strain healthcare and social support systems.

Recommendations

1. Dedicated Funding for Not-For-Profit Builders

Recommendation 1: BCH should adopt a seniors' housing priority stream to ensure dedicated funding and technical assistance for not-for-profit seniors' affordable and social housing projects, and long-term care home Projects. BCH should also fast-track approvals for not-for-profit projects serving seniors.

Recommendation 2: BCH should allocate funding to develop not-for-profit long-term care homes, ensuring safe, modern, and accessible long-term care beds for Canada's most vulnerable seniors. The proposed seniors' housing priority stream should include not-for-profit long-term care homes.

Recommendation 3: BCH should include a distinct Indigenous stream co-designed with indigenous institutions and seniors housing organizations to reflect unique cultural and geographic realities.

2. Incentivizing Not-For-Profit Projects

Large-scale developments are critical, but high thresholds for projects (e.g. 300+ units) will exclude smaller community-led or rural projects that still deliver significant local impact. Requiring smaller initiatives to be bundled into aggregated portfolios can introduce additional financial risk, add complexity to debt-servicing arrangements, and create barriers for mission-driven not-for-profit providers that may lack the capacity or resources to manage multi-project financing structures. Also, the financial structure and procurement model of large deals may disproportionately benefit well-capitalized developers, which will leave smaller not-for-profit providers at a disadvantage.

To better support and encourage not-for-profit projects, we recommend the following actions:

Recommendation 4: BCH should adopt and implement a tiered project size framework that enables participation from large-scale developments, aggregated portfolios of smaller projects, and smaller community-led or rural initiatives.

Recommendation 5: Project designs must ensure equitable access to financing/funding and development support for regions where smaller-scale, dispersed projects are more feasible than large developments.

Recommendation 6: Establish strong accountability frameworks for private partners that enforce long-term affordability. Risk-sharing with private partners is critical, but without robust governance, there is a danger of public investments subsidizing private profits without delivering lasting affordability.

Recommendation 7: BCH should establish a regulatory alignment task force that includes representatives from federal, provincial/territorial, and municipal governments, as well as indigenous institutions. This will help avoid misalignment in zoning, permitting, and servicing capacity that could delay projects despite available funding.

Conclusion

BCH presents an opportunity to transform Canada's housing landscape for seniors by incorporating age-friendly principles, equitable access for not-for-profit providers, and addressing regulatory barriers to create sustainable, supportive, and inclusive communities where seniors can thrive.

We appreciate the opportunity to contribute these perspectives and welcome continued engagement as the program is designed.

Information Contact

Lisa Levin
Chief Executive Officer
905.851.8821 x 230
llevin@advantageontario.ca