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Planning and Housing Committee ([phc@toronto.ca](mailto:phc@toronto.ca))

**RE: Multi-Tenant Housing Review, Planning & Housing Committee, 25.10. June 28, 2021**

We have read the proposed Multi-Tenant Housing Draft By Law. Below are our comments. Of particular concern are the issues of student housing and concentrations:

We are not clear on how private residences accommodating groups of students is being addressed and regulated within the Multi tenant housing framework.

We see you have added a new definition (478) for “Multi-tenant house” to Chapter 800.50 of By Law 569-2013 that has as an exclusion for “student residence”, however according to the current By-law definition of “ (804) Student Residence “ this only relates to those facilities “operated by a public school, private school, post-secondary school or educational facility” and **does not address the houses near universities owned by private individuals who rent out bedrooms, some as small as closets, to as many students as they can cram in.**

**Multi-tenant House** - means a building with four or more dwelling rooms that may have shared common facilities for sanitary and cooking. A group home, residential care home, nursing home, retirement home, seniors community house, religious residence, student residence, tourist home, or hotel is not a multi-tenant house.

**Student Residence ((840) Chapter 800.50 Zoning By Law- 569-2013)** - means premises owned and operated by a public school, private school, post-secondary school or educational facility, consisting of dwelling units, bed-sitting rooms or rooms, used for student accommodation.

**The corresponding amendment to the Etobicoke Zoning By-law Definition in Section 304-3, is different than the proposed definition for By Law 569-2013 noted above, and the proposed definition for Etobicoke does not make reference to “student residence”, as an exclusion, thereby including it, by default, within the multi-tenant housing category and subject to its regulatory framework.**

47. “MULTI-TENANT HOUSE - means a building with four or more dwelling rooms that may have shared common facilities for sanitary and cooking. It shall exclude a hotel, hospital, group home or home for the young or aged under provincial statute or similar establishment, a rest home or retirement home, transitional residence or dormitory and premises operated as a lodging-house by social clubs, and religious orders for their members. “

The corresponding Amendment to the Etobicoke By Law also retains, through Section 45 of the proposed By Law, the definition of “Lodging House”, amending it to include, as an exclusion, “multi-tenant house.”

45. LODGING-HOUSE — A dwelling in which lodging, with or without meals, is provided for remuneration to at least three tenants. It shall include a boarding house, rest home or retirement, transitional residence or dormitory and premises operated as a lodging-house by social clubs, and religious orders for their members. It shall exclude a hotel, hospital, multi-tenant house, group home or home for the young or aged under provincial statute or similar establishment.

***These definitions are not consistent and neither proposed amendment, to By Law 569-2013 or to the Etobicoke By-law, address the issue of student housing in private residences or the potential for disruptive concentrations within residential neighbourhoods in close proximity to colleges and universities.***

## **The Concerns of Long Branch**

History has proven there is a very real probability of our neighbourhood becoming a student ghetto with all the well-documented, associated problems. We are already seeing the increasing existence of this use. We raised this concern during the Community Engagement.

How has this issue been addressed in the proposed Zoning By Law Amendment?

Neighbourhoods like Long Branch, are vulnerable to over concentrations of particular uses. Long Branch has already experienced this in the 1980’s when Lakeshore Psychiatric Hospital closed its inpatient services and replaced them with housing in the community. Because of its proximity to the Hospital, Long Branch became the epicenter of lodging houses for psychiatric patients and that situation needed to be controlled and ultimately, precipitated the Etobicoke Lodging House By Laws. The proposed Multi Tenant By Law, as written, seems to be putting Long Branch in the same situation, this time, with respect to student housing, as the Hospital Grounds now house the ever expanding, Humber College Lakeshore South Campus.

The proposed Multi Tenant Housing By Law needs to properly address the student housing issue and also to recognize that some neighbourhoods in the City are more susceptible to over-concentrations of the multi tenant housing use, due to proximity to transit, services, universities and colleges. Moreover, there needs to be an understanding as to available school capacity within an neighbourhood to serve the population growth. Long Branch schools are already over capacity and children need to be bused out to attend out of area schools.

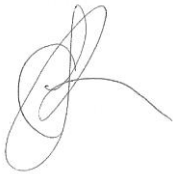
As per the original Council Motion, the unique circumstances of some of the City’s neighbourhoods need to be looked at on an individual basis not swept up in a broad brush approach. Long Branch, for example, in addition to the issue of student housing, also already includes a large percentage of renters living in multi tenanted properties within our neighbourhood’s RS and RM zones, so encouraging more multi tenant housing in other neighbourhoods, where that mix does not exist, should be a consideration.

One additional concern is the need to recognize that the City’s pursuit of such a stringent regulatory framework, speaks to the nature of the operators and the tenants using this form of housing. It is important to acknowledge that transient renters and owners out for profit, do not have the same vested interest in a neighbourhood, as a more traditional owner would, and, as more of these multi tenant uses are introduced into a neighbourhood, the character of the neighbourhood will change. **We believe that a spacing requirement and limits on total number of multi-tenant housing within a neighbourhood should be part of this Multi Tenant Housing By law.** Today, Long Branch has forms of multi tenant housing that predate amalgamation. However, as mentioned earlier in this letter, concentrations of this housing have been regulated by limiting the number in a neighbourhood. This is not against the Housing Charter as adopted in 2009, but in the case of Long Branch, shows that such as neighbourhood with different housing uses and zoning put together can create a diverse neighbourhood available to many Toronto residents.

Finally, in the event of new multi tenant housing being built, there has been no provision in this proposed Bylaw Amendment to factor in the existing Neighbourhood Guidelines. Long Branch is one of the only neighbourhoods in Toronto that has Council approved Guidelines that ensure new development respects and reinforces the Neighbourhood Character. There needs to be a vehicle in the proposed Bylaw that allows for these Guidelines to be applied within the Multi Tenant housing framework.

Given that these issues have clearly not been addressed within the Proposed Draft By Law, we ask that this matter be deferred to give staff time to consult and arrive at solutions that speak to our concerns.

Sincerely,

A handwritten signature in black ink, appearing to read 'Christine Mercado', with a long horizontal stroke extending to the right.

Christine Mercado  
Chair,  
Long Branch Neighbourhood Association

Cc

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