

June 28, 2021

Sent via email: phc@toronto.ca

Planning and Housing Committee
City of Toronto,
10th floor, West Tower, City Hall
100 Queen St. West
Toronto, Ontario M5H 2N2

Dear Chair and Committee members,

Re: A New Regulatory Framework for Multi-tenant Houses (PH 25.10)

I am writing on behalf of the Advocacy Centre for Tenants Ontario (ACTO) to inform you of our support for the proposed regulatory framework for multi-tenant houses to be considered by the Committee at its June 28th meeting. ACTO is a community legal clinic funded by Legal Aid Ontario to provide legal services to low-income tenants across Ontario on the systemic issues that affect their ability to provide and maintain decent homes for themselves and their families. We urge the committee to adopt these recommendations to recognize multi-tenant houses as a legitimate form of housing in all parts of the city.

ACTO has advocated for a comprehensive framework for multi-tenant houses since we wrote to the Planning and Growth Management Committee on September 30, 2010 about the Consolidated Zoning By-law that Council had just adopted. That By-law left in place the zoning patchwork of the former municipalities that make up the City and continues to this day. Current zoning and licensing by-laws for multi-tenant houses are fragmented and have not been harmonized since amalgamation.

The resulting patchwork of the current zoning regime creates instability when it comes to providing a basic need for tenants. Multi-tenant houses that are not allowed by zoning regulations must function underground, which increases risks to health and safety. The lack of uniformity in licensing and enforcement of safety standards can often result in inadequate and unsafe living conditions for tenants. This is particularly troubling given that multi-tenant houses provide one of the very few affordable housing options left in the city of Toronto, and serve a diverse range of tenants including students, seniors, new immigrants and low/moderate income individuals.

We fully agree with the report that multi-tenant houses are an important part of the housing stock in the city, and have provided affordable housing in Toronto for more than a century. The comprehensive set of measures that is proposed, including

- City-wide zoning standards
- Enhanced operator licensing requirements to enhance health and safety,
- A strategic inter-divisional enforcement and compliance program that will ensure effective enforcement of non-compliant operators,
- Programs to support tenants and maintain housing affordability of housing; and
- A phased implementation to launch the new framework over a three-year period.

These important initiatives are necessary to achieve meaningful recognition of rooming houses as a legitimate form of residential land use. We are encouraged to see a human-rights based approach to multi-tenant houses, in accordance with the City's new Housing Charter that states "All residents have a right to a home in a complete community with equitable access to a range of opportunities to live, work, learn and play". Surely this must include granting residents of multi-tenant houses their long-overdue recognition as legitimate members of our communities.

While we support the proposed framework, we urge the City to include a strong displacement prevention strategy in its implementation. Enhanced operator licensing requirements are important for the health and safety of tenants, but we also want to prevent unintended consequences such as the loss of existing dwelling rooms and the resulting displacement of tenants who have very few other options. We recommend that the City prioritize working with tenants, community organizations, and multi-tenant housing operators to support the transition to the new standards and prevent the displacement of current tenants.

In sum, we urge you to adopt this proposed framework and use your efforts as councilors and as housing advocates to bring your fellow members of Council around to a position that sees everyone as deserving of a home in the community of their choosing.

Yours very truly,

Advocacy Centre for Tenants Ontario

per:



Douglas Kwan,
Director of Advocacy and Legal Services