



Advocacy Centre for Tenants Ontario
Centre ontarien de défense des droits des locataires

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Sent by e-mail to:
pgmc@toronto.ca

Planning and Growth Management Committee
10th floor, West Tower, City Hall
100 Queen Street West
Toronto, ON M5H 2N2

Dear Chair and committee members,

Re: Agenda item PG34.4 – Draft Official Plan Policies for Implementing a Development Permit System (DPS) - Final Report

I am writing on behalf of the Advocacy Centre for Tenants Ontario (ACTO) with the following comments and questions on the above-mentioned agenda item.

ACTO is a specialty legal clinic, funded by Legal Aid Ontario. We work for the advancement of human rights and social justice in housing for low-income Ontarians through legal advice and representation, law reform, community organizing, and education and training. The clinic also coordinates the Tenant Duty Counsel Program across Ontario which provides legal information assistance to self-represented tenants appearing at the Landlord and Tenant Board. ACTO works closely on housing issues with the community legal clinics in the City of Toronto.

ACTO has actively participated in the City's comprehensive review of its Official Plan, particularly focusing on the policies related to affordable rental housing. As the City is aware, 92% of all residential development in Toronto since the Official Plan came into effect on October 17, 2006 has been condo (about 75%) or freehold, and only 8% was purpose-built rental. This fact is alarming considering that 45% of all households in the City of Toronto are renters and that 93,000 more renter households are expected by 2031 (see the attached City fact sheet on Housing Options).

To meet the demand for rental housing for these additional tenant households, an average of 4,895 new units would have to be built annually. This is almost four times more than the annual target of 1,000 new rental units in ***Housing Opportunities Toronto***, the city's 10-year affordable housing action plan.

We have been following the discussions and consultation on the proposed DPS with interest and believe more detail and clarification must be provided, before it is adopted by Council, regarding the following:

1. What kind of supports will be provided for meaningful community engagement in creating a vision for a neighbourhood that adequately provides for a full range of housing, including affordable rental housing?
2. Who will have the city-wide "big picture" on healthy, inclusive city-building goals if DSP is done neighbourhood by neighbourhood?
3. Who will determine the height and density thresholds in neighbourhoods under a DPS? Clarity on this matter is especially important since DPS originated with Council's concern over "tall" buildings. The City's Chief Planner has indicated that all new residential growth can be accommodated by mid-rise projects (i.e. no taller than 12 stories).
4. How will "economic uplift" be determined for the purpose of negotiations on community facilities under DPS?
5. If it arises, how will NIMBYism be addressed under a DPS?
6. What will be the criteria for determining if development can proceed, particularly if developers are not receptive to building new affordable rental housing?

Thank you for your attention to our concerns and questions.

Sincerely,



Mary Todorow
Research/Policy Analyst
Advocacy Centre for Tenants Ontario

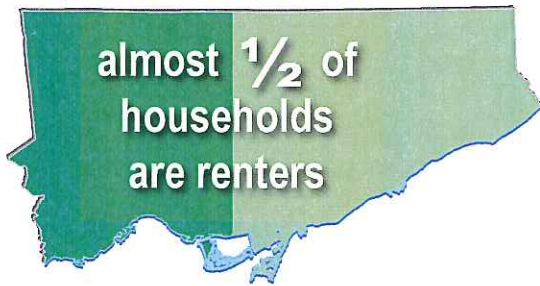
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Housing Options

Toronto continues to experience challenges maintaining a healthy supply of rental housing and ensuring an adequate provision of affordable housing

440,000+ households rent

This is more than the combined total number of all households in Mississauga, Brampton and Markham and nearly 1/2 of Toronto's households



The Official Plan aims to provide a range of housing - both in tenure and affordability - across the city for current and future residents

inclusive neighbourhoods **affordability** HOUSING CHOICE
rental ownership seniors families **SOCIAL MIX**



The Goal ...

- conserving existing rental and social housing
- encouraging the supply of new affordable rental and ownership housing
- protecting tenants

1.7% vacancy

Only 17 of every 1,000 units in Toronto are available to rent



93,000 more rental households by 2031

are expected in Toronto. This is roughly the same number of households as in the City of London, Ontario

Renters face greater affordability problems

