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ACTO
TDCP

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Deputation to City of Toronto's Affordable Housing Committee
from the Advocacy Centre for Tenants Ontario (ACTO)

Meeting of Wednesday, September 2, 2015
Committee Room #1, City Hall

Re: Agenda item AH3.5 – TO Prosperity – Interim Poverty Reduction Strategy

Good morning to the Chair and members of the Committee.

My name is Mary Todorow, and I am a research and policy analyst with the Advocacy Centre for Tenants Ontario. ACTO is a community legal clinic, funded by Legal Aid Ontario, with a province-wide mandate. 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 and assistance to self-represented tenants appearing at the Landlord and Tenant Board – and we directly manage the delivery of the Tenant Duty Counsel services in Toronto and Mississauga. In most cases, those tenants are respondents to eviction applications due to rent arrears. As you may know, one in five tenant households across the province are paying 50% or more of their gross household income on rent and are at an ever-present risk of losing their home when they face the hard choices between paying for their shelter, or other basic needs of daily life such as food, transit, clothing and medicine.

I am here today to strongly support the adoption of a Poverty Reduction Strategy by Council and to speak specifically to some of the housing recommendations and actions outlined in the Housing Stability section of the interim Strategy.

The interim strategy clearly acknowledges that paying for housing costs is generally the biggest financial challenge for people living in poverty – the majority of who are renters. Stable, safe, affordable housing in a state of good repair and maintenance is essential to reducing poverty in our city and ACTO is pleased to see the prominence that housing stability is given in the strategy.

I'd like to start with the recommendation that the supply of affordable housing be increased. I attended the recent Planning Division open house on the proposed new definition of Affordable Ownership Housing for the Official Plan and was yet again shocked to see the statistic that **ownership** housing units have accounted for more than 90% of the new residential units produced over the last two decades.

Renters make up 45% of Toronto's households and it's projected that there will be 93,000 new renter households by 2031. Where will these new renter households – who have half the median and average income of homeowners – find housing? As well, there are (as of June 30th) 93,515 households waiting for rent-geared-to-income social housing units.

In Toronto's 10 year Housing and Homelessness Plan, action #46 calls for the City to support the development of 1,000 new affordable **rental** units annually over ten years in cooperation with private, non-profit and co-operative housing partners. ACTO asks that the Committee consider doubling that target – at the very least – in the implementation plan for the poverty strategy in the face of the increasing demand for, and inadequate supply of, rental housing in our city. This is an ideal time to advocate for this increased target because the City is underway with a five-year review of the HOT plan.

As part of this increase in the number of rental units being built annually, I'd like to highlight for the Committee –although most may be aware of this fact - that the "affordable" rental housing built with funding from the Ontario/Canada cost-shared Investment in Affordable Housing (or IAH) program is defined as having rents at or below 80% of average CMHC market rents. I doubt that most of those 93,000+ households on the city's social housing waiting lists have incomes to pay those just-below market rents. Additional housing allowances would be required to bring down those below-market rents to an affordable level (i.e. 30% of total housing income). The interim strategy proposes increasing the number of housing allowances – which ACTO supports – but we ask that there be requirement that providing those housing allowances be linked to the rental building and units being in compliance with property standards and in a good state of repair.

ACTO agrees with the action 3.2 in the interim strategy that affordable housing should be the first priority community benefit for section 37 negotiations with developers who want increased height and density for their residential projects – but we recommend that the Committee should include a target for the percentage of **rental** housing units obtained in such negotiations and report annually on achieving that target.

With respect to the quality of the existing rental housing in the City, ACTO agrees with the proposed action in the strategy that enforcement of minimum housing standards should be strengthened. We believe this means increasing the resources of the Municipal Licensing and Standards (ML&S) to investigate and follow through on tenants' property standards complaints to ensure that orders are completed in a timely manner. ACTO asks that the Committee consider setting targets for increasing the staffing in ML&S in the implementation plan and that funds should be allocated for an ongoing education and outreach program to inform tenants of the role that property standards plays in ensuring that landlords carry out their responsibilities in section 20 of the *Residential Tenancies Act* to provide buildings and rental units in "a good state of repair and fit for habitation and for complying with health, safety, housing and maintenance standards."

Mayor John Tory issued his housing and social inclusion policy during the mayoralty campaign which included support for a National Housing Strategy. ACTO understands that municipal governments alone cannot address the affordable housing and homelessness crisis across Canada. It requires the participation of all levels of government, the private sector, civil society partners and sustained funding. Our clinic is part of a Right to Housing Coalition advocating for the adoption of a National Housing Strategy. We ask that you include support for a National Housing Strategy in the City's Poverty Reduction Strategy.

Thank you.