

March 15, 2019

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: As-of-right zoning for secondary suites (PH3.1)

I am writing on behalf of the Advocacy Centre for Tenants Ontario (ACTO) to inform you of our support for the draft zoning by-law amendment to be considered by the Committee at its March 20th meeting. We urge the committee to adopt this by-law amendment which will help facilitate the creation of secondary suites in Toronto.

ACTO supports these proposed amendments as they are in keeping with the direction set out in the *Planning Act*, s. 2 (j) to have regard to the provincial interest in the adequate provision of affordable housing. Unreasonable restrictions on the permissible locations for secondary suites are inconsistent with the housing policies contained in the Provincial Policy Statement 2014 (PPS) and thus contrary to the City's obligations under the *Act*. In particular the City is obliged by the PPS (at para. 1.4.3) to:

“... provide for an appropriate range and mix of housing types and densities to meet projected requirements of current and future residents of the *regional market area* by ...permitting and facilitating:


1. all forms of housing required to meet the social, health and well-being requirements of current and future residents, including *special needs* requirements; and
2. all forms of *residential intensification*, including second units...”.

While secondary suites do not provide the same security of tenure as purpose-built rental housing – particularly since suites created on or after November 15, 2018 will not be rent regulated – ACTO believes such units do add to sorely needed housing options in Toronto. Thank you for your consideration of our recommendation.

Yours very truly,

Advocacy Centre for Tenants Ontario

per:



Kenneth Hale,
Director of Advocacy and Legal Services