



Toronto Alliance to End Homelessness (TAEH) Human Rights Working Group

April 30, 2019

Send to [phc@toronto.ca](mailto:phc@toronto.ca)

Re: PH5.2 Revised Official Plan Policies to Address the Loss of Dwelling Rooms

I am writing to the committee on behalf of the Toronto Alliance to End Homelessness (TAEH) Human Rights Working Group. TAEH is committed to working with the City of Toronto and others to end homelessness in the city. We have established the Human Rights Working Group to focus on systemic barriers to the realization of adequate housing, which is essential to realizing an end to homelessness.

We were delighted to learn that Leilani Farha, the United Nations Special Rapporteur on the Right to Adequate Housing, will be addressing Tuesday's Planning and Housing Committee meeting.

The Planning and Housing Committee will have an immediate opportunity to advance the spirit of the "right to housing" in your first item of business on Tuesday: consideration of Revised Official Plan Policies to address the loss of Toronto's dwelling rooms.

As you know, dwelling rooms are one of the few housing options that are affordable to low income people and often the only way to achieve their right to adequate housing and avoid becoming homeless.

It has now been four years since Councillor Layton called for the City to adopt a policy to protect both dwelling room tenants and Toronto's diminishing supply of affordable rooms. During those four years, hundreds of tenants have been forced out of their homes to make way for new developments. Many of these displaced tenants are now homeless. We simply cannot wait any longer for the City to take action.

Unfortunately, the revised policies before you today for consideration may take us even further away from realizing housing as a human right in Toronto. They may unintentionally create new incentives for landlords to raise tenants' rents or to drive them out of their homes. Exempting rooms charging above mid-range rents

may simply encourage landlords to push rents above the exemption threshold. Permitting higher replacement rents for non-returning tenants may encourage landlords to chase out sitting tenants.

We understand that these revisions were developed after community consultations as an attempt to "balance" the interests of tenants with those of the development industry. We believe that this is a false balance. The right to a home -- a room that you can afford, and still have some money left over for food and other necessities -- must always take precedence over the interests of simply making money, or even making, as some will argue, "the highest and best use" of a site. That highest and best use must first respect the right to housing of vulnerable tenants.

We are asking the Planning and Housing Committee to ensure that this well-intentioned policy will truly protect the homes of the Torontonians who now live in justifiable fear of ending up on the street and homeless.

We recommend that the Planning and Housing Committee adopt the amendments to the staff proposal put forward by the Rooming House Preservation Policy Working Group, expedite the public consultation process, stem the further loss of some of Toronto's most affordable homes and prevent more vulnerable people ending up homeless.

Thank you for your commitment to access to adequate housing in Toronto.

Sincerely,

Paul Dowling, Chair  
Joy Connelley  
Human Rights Working Group  
Toronto Alliance to End Homelessness