

April 26, 2019

Sent via email: [phc@toronto.ca](mailto:phc@toronto.ca)

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

Dear Chair and Committee members,

**Re: Revised official plan policies to address the loss of dwelling rooms (PH5.2)**

I am writing on behalf of the Advocacy Centre for Tenants Ontario (ACTO) to ask you to approve the revised official plan policies to address the loss of dwelling rooms with the revisions recommended by the Parkdale Neighborhood Land Trust.

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. The City has acknowledged in its Affordable Housing Action Plan 2010-2020 that rooming houses are an essential part of the range of affordable housing options required in Toronto and that this form of housing must be preserved. ACTO strongly supports this goal which will help keep low-income people housed and prevent evictions into homelessness.

ACTO supports the following revisions to the proposed official plan policies that we believe will strengthen the framework that is being developed to protect the existing supply of dwelling rooms:

1. Eliminate the provision that specifies that the policy does not apply to situations where “all of the dwelling rooms have rents that exceed dwelling room mid-range rents at the time of application”.
2. Expand the requirement to keep rents similar to those in effect at the time of the development application so that it applies not only to replacement “dwelling rooms” but to all replacement housing that will be occupied by returning tenants.
3. Require all replacement housing to be rented at the same rates as those in effect at the time of the development application.
4. Eliminate the definitions for dwelling room affordable rent and dwelling room mid-range rents.

5. Change the affordability period for replacement housing back to 25 years.

We strongly support the Official Plan amendment's intention to have the revised policies apply to both licensed and unlicensed rooming houses. To better advance the important objectives of these policies, we urge you to prioritize work on the city-wide zoning bylaw for rooming houses. Thousands of dwelling room units are currently deemed to be unlawful because of the outdated provisions of the zoning by-law (569-2013). Furthermore, we ask you, as part of your efforts to protect dwelling rooms and the tenants that live in them, to reconsider the City's position on this issue in the current proceedings on that by-law at the Local Planning Appeal Tribunal.

Thank you for attention to our comments and recommendations. Please keep us notified of upcoming Committee and Council meetings on this proposal.

Yours very truly,

**Advocacy Centre for Tenants Ontario**

per:



Kenneth Hale,  
Director of Advocacy and Legal Services