

April 29, 2019

Pablo Escobar
Manager, Housing Supports,
Dixon Hall Neighbourhood Services
58 Sumach Street, Toronto, On, M5A 3J7
416-863-0499
Pablo.escobar@dixonhall.org

Attn: Planning and Housing Committee

Re: Revised Official Plan Amendment to Section 3.2.1 of the Official Plan

Thank you for the opportunity to address the Planning and Housing Committee on such an important topic as a policy amendment to the Official Plan to address the loss of dwelling rooms. This amendment is a very important step in protecting the availability and affordability of low-end of market rental housing in the City of Toronto and we fully endorse its intent.

There are, however, several clauses within the Revised Official Plan Amendment (OPA) that undermine its goals of affordability and the retention of Dwelling Room stock. These clauses, if left within the OPA, provide a pathway to increased rents and dwelling room loss.

Section 1. a. all of the Dwelling Rooms have rents that exceed Dwelling Room Mid-Range rents at the time of the application.

This clause in exempting dwelling rooms whose rents exceed Dwelling Room mid-range rents, will promote rent increases so as not to be captured by the proposed OPA. By providing a maximum rent threshold, developers are provided the opportunity to avoid all the requirements of the OPA by increasing rents.

Recommendation: Eliminate provision 1.a that provides a maximum rent threshold.

Section 1. i. A. where an increase in height and/or density is sought, the provision of additional replacement Dwelling Rooms or units to achieve at least the same number of existing Dwelling Rooms lost will be secured.

According to City staff, Section 5.1.1 and its reference to sect. 37 do not apply in all cases. In these cases, the OPA's goal of dwelling room replacement is unenforceable.

Also, by providing the opportunity to replace dwelling rooms with dwelling units, the goal of stock retention is negated. As dwelling units have higher rents, the goal of maintaining affordability is also negated.

Recommendation: Replace provision 1. i. A with a provision that states that all dwelling rooms will be replaced.

Section 1. iii. For a period of at least 10 years, the rents for replacement Dwelling Rooms will be similar to those in effect at the time the development application is made, or at Dwelling Room Affordable Rent or Dwelling Room Mid-Range Rent as applicable if there is no returning tenant

The clause speaks to rents for replacement units being similar to those in effect at the time the development application is made. The term “similar” implies a range of rents. The OPA, however, does not provide a structure to define it.

Recommendation: Replace the term “similar” with “same”.

The clause also states that if there is no returning tenant the rent will be at Dwelling Room Affordable Rent or Dwelling Room Mid-Range rent as applicable. In most cases, this will lead to an increase in rent for the unit as the vast majority of at risk, low income tenants will have, of necessity, found new accommodation and will not exercise their right of return. Creating differential rents for returning and new tenants lays the foundation for increased rents and loss of affordability.

Recommendation: Remove all reference to Dwelling Room Affordable Rent and Dwelling Room Mid-Range Rent and the reference to “no returning tenant” and replace with a clause that states “the rents for replacement Dwelling rooms will be the same to those in effect at the time the development application is made.

As an Agency that provides supports to vulnerable tenants living in rooming houses, Dixon Hall strongly supports the intent of the Official Plan Amendment to mitigate dwelling room loss and the loss of affordable rents. We therefore support that the OPA move forward to the next stage of consultations with a recommendation from the Planning and Housing Committee that the changes noted above be made.

Sincerely,

Pablo Escobar
Manager, Housing Supports,
Dixon Hall Neighbourhood Services
58 Sumach Street, Toronto, On, M5A 3J7
416-863-0499
Pablo.escobar@dixonhall.org