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Councillor Gord Perks
Chair of the Planning and Housing Committee
Toronto City Hall
100 Queen Street West
Toronto, ON, M5H 2N2

Re: PH26.3 - Multi-Tenant Houses Regulatory Framework: Implementation Update

Dear Members of the Planning and Housing Committee,

Nellie's women shelter. We are writing in response to item [PH26.3 - Multi-Tenant Houses Regulatory Framework: Implementation Update](#).

In the midst of an escalating housing and homelessness crisis characterized by rising rents, increasing evictions, diminishing affordable options, and limited renter protections (which will be further accelerated following the passage of the provincial *Fighting Delays, Building Faster Act, 2025*), the multi-tenant houses (MTH) framework is an important step toward protecting affordable housing across the city. MTHs (also known as rooming houses) are a vital element of affordable housing infrastructure and provide homes to some of the most vulnerable members of our communities, including refugees, newcomers, social assistance recipients, students, and other low-income and marginalized groups.

Nellie's supports this letter because multi-tenant housing is an important part of Toronto's affordable housing stock. While not all our residents rely on MTHs, some could benefit from these units as a viable pathway to stable, low-cost housing. Protecting and improving MTHs helps reduce pressure on the shelter system and expands the housing options available to women and gender-diverse people seeking safety and long-term stability.

As part of its commitment to progressively realize the right to housing (as outlined in the [Toronto Housing Charter](#) and [HousingTO 2020-2030 Action Plan](#)), the City must ensure that MTH renters have safe, secure, and affordable homes. In the absence of sufficient affordable housing in the private rental market and community housing sector, there are increasingly few options available to displaced MTH renters, who are often very low-income and face other intersecting socioeconomic barriers. As a result, if an MTH renter loses their home, it is likely that they may

experience homelessness. While homelessness is above all a moral, systems failure, it also puts undue pressure on costly public services, many of which are borne out at the municipal level (including shelters, policing, public health, and other social services).

As outlined in the MTH implementation update report, it is promising to see the City take some meaningful steps toward monitoring the implementation of the MTH framework, including by gathering and sharing data on operational insights, licensing and enforcement, interdivisional collaboration, findings from a land economics study, and community engagement activities. The report also proposes some important changes that aim to improve access to the MTH Renovation Program, clarify licensing and zoning requirements, and enhance monitoring and data collection. It is also encouraging to see the City developing housing as a human right training for all housing-related staff.

However, we remain concerned that **the City's current approach and proposed changes outlined in the staff report do not address the specific situations of potential MTH renter displacement and affordable housing loss under the MTH framework**, including as a result of:

- Zoning restrictions (e.g., the six-room limit for MTHs in many areas of the city)
- MTH operator sales or conversions, and
- Ongoing unlicensed MTH operations (highlighted as a key challenge in the staff report).

To help prevent MTH renter displacement and affordable housing loss, we support the following recommendations put forward by the Right to Housing Toronto network (R2HTO), based on engagement with MTH advocates across the city:

1. Provide meaningful support for MTH renters

- a. Displacement protection:** The City should develop targeted programs and policies to support MTH renters facing displacement. This could include emergency and/or portable housing benefits, alternative housing solutions, and/or system navigation.
- b. Outreach and engagement:** The City should increase funding to conduct more proactive outreach to MTH renters and provide ongoing engagement opportunities, including by building on the proposed outreach improvements recommended in the staff report. This could also include establishing an MTH Renter Advisory Committee (building on the work of the Housing Rights Advisory Committee outlined in the report) and/or hosting MTH town halls.

2. Remove restrictive MTH requirements

- a. Room counts:** The City should increase the limit on the number of allowable MTH rooms in Scarborough, Etobicoke, and North York from six to 12-25 to minimize displacement, ensure city-wide consistency, and maximize access to MTHs across the city.

- b. **Zoning and licensing exemptions:** The City should explore providing zoning and licensing exemptions for City-funded properties and previously licensed private MTH properties that otherwise comply with the framework to encourage operators to continue providing affordable housing.

3. Increase funding for MTH preservation

- a. **Renovation and repair funding:** The City should increase funding for and improve access to the MTH Renovation Program to help operators come into compliance with the MTH framework, including by building on proposed changes to improve program access recommended in the staff report.
- b. **Acquisition funding:** The City should prioritize and maximize funding for the Multi-Unit Residential Acquisition (MURA) program to acquire MTHs at risk of sale or conversion, including by directing federal and provincial funding toward the program (e.g., Canada Rental Protection Fund).

4. Strengthen MTH monitoring, enforcement, and accountability

- a. **Internal coordination:** The City should coordinate enforcement and implementation of the MTH framework across City divisions to prioritize renter safety and security and affordable housing preservation.
- b. **Data collection:** The City should gather data on MTH renter displacement and affordable housing loss across the city, including by building on the proposed data collection changes recommended in the staff report.
- c. **Monitoring and reporting:** The City should regularly monitor and report on the impact of the MTH framework on renter displacement and affordable housing loss, including by building on the proposed monitoring and reporting changes recommended in the staff report.
- d. **Situation Table for Housing-At-Risk expansion:** The City should expand the mandate of the new Situation Table for Housing-At-Risk (STAR) to include policy monitoring and development, with a specific focus on protecting MTH renters and preserving affordable housing.

MTHs are the City's only naturally occurring source of deeply affordable housing. To protect this critical part of Toronto's affordable housing infrastructure and the people who live there, we strongly urge the Committee to bring forward and/or vote in favor of any motions that support the recommendations outlined above. In addition, we encourage the Committee to continue engaging with R2HTO and other MTH advocates in the further development of policies and programs to help protect MTH renters, preserve affordable housing, and uphold the right to housing across Toronto.

Thank you,



Jiin Yiong
Program Director