

## DEPUTATION

To: Planning and Housing Committee

Date: December 3, 2025

Re: PH.26.3 – Multi-Tenant Houses Regulatory Framework: Implementation Update

Dear members of the Planning and Housing Committee,

Thank you for the opportunity to speak to you today on the implementation of the new MTH framework.

My name is Pablo Escobar, and I am the Chair of the Toronto Alliance To End Homelessness' System Barriers to Housing Working Group.

The Toronto Alliance to End Homelessness (TAEH) is a community-based collective impact initiative committed to ending homelessness in Toronto. Our network includes non-profit organisations that support those living with homelessness and those who are housed and who must spend a disproportionate amount of income on housing, as well as affordable and supportive housing developers, property managers, and landlords.

The Systems Barriers to Housing Outcomes Working Group of the TAEH is comprised of community experts who identify systemic challenges in access to housing for the most vulnerable and create recommendations for system changes to increase inflow into permanent housing.

We welcome this opportunity to speak to you today about our concerns related to the impacts of the zoning requirements for Multi-Tenant Housing as these relate to room caps in Scarborough, North York and Etobicoke.

TAEH supported City Council's decision to licence multi-tenant dwellings across the city as this type of housing is often the only one available to people with very low income. We did so, in part, because there were commitments and Council direction to develop strategies to ensure that this housing stock would be protected.

We therefore support the proposed changes to revise the Multi-Tenant Houses Renovation Program contained in this report.

The report before you today, however, paints a troubling picture of the effect of the new licensing regime on the growth of licensed MTH stock.

The Implementation report and the Multi-Tenant Housing Land Economic Study point out that no new MTH's have been licensed under the new framework. In other words, rooming houses in areas where they were not permitted prior to the legislation, continue to be illegal. Tenants, therefore, who were living in unlicensed rooming houses prior to framework implementation, continue to do so. As of today, tenants in Scarborough, North York and Etobicoke do not have the opportunity to live in safe, legalised rooming houses as they would if they lived in other areas of the city.

Though there are multiple factors associated with the lack of growth of licensed MTH's, one of the main reasons identified by the Multi-Tenant Housing Land Economics Study commissioned by the City and attached to this report, is the 6-room cap which primarily affects suburban properties in Scarborough, Etobicoke and North York. Of the 8 case studies carried out for this report, only 1 was economically feasible and this was because it had higher density than the rest at 12 rooms. The report states that "increasing permissions to allow for more dwelling rooms will improve feasibility" (p. 31). It therefore recommends that the City consider expanding the dwelling room cap (p. 44).

Currently, landlords with properties that don't meet zoning requirements due to the room cap are encouraged to apply to the Committee of Adjustment for a minor variance. The report notes, however, that landlords are reluctant "to seek Committee of Adjustment approvals due to the application costs and process

uncertainty”. As such, according to City staff, only two operators have sought variances to operate more rooms. Of these, one was approved.

The structure for increasing room caps in areas of the city where the maximum allowable number is 6 already exists in the legislation. In the old City of Toronto, East York and York, the allowable number of rooms is 6, 12 or 25, depending on whether these are in low- or high-density zones. Expanding existing zoning permissions to Scarborough, North York and Etobicoke, will not only increase consistency in the implementation of zoning requirements, but will also ensure that core policy objectives of this framework are met. These include harmonizing zoning permissions across Toronto, preserving and expanding deeply affordable housing and applying an equity lens to the regulation of multi-tenant housing where the housing opportunities that exist in other areas of the city are afforded in all neighbourhoods.

**Recommendation:**

**We therefore recommend that the zoning regime related to room caps that currently exists in the Old city of Toronto, York and East York be expanded to Scarborough, North York and Etobicoke.**

Our working group and all TAEH members are ready to support the City in moving forward with our recommendation and appreciate your consideration of it today. Together, we can work to strengthen this very important piece of legislation so that zoning permissions are harmonized across the city of Toronto and the goals of retaining and expanding the stock of Multi-Tenant Houses become attainable.

Thank you,

Pablo Escobar, Chair

System Barriers to Housing Outcomes Working Group, TAEH