



Landlord's Self-Help Centre

A specialty legal clinic funded by Legal Aid Ontario

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Delivered by email to: PlanningConsultation@ontario.ca

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Ministry of Municipal Affairs and Housing

Re: Planning Consultation Submission

Landlord's Self-Help Centre appreciates the opportunity to participate in this important consultation. We are a community specialty clinic funded by Legal Aid Ontario that operates with a mandate to provide support to homeowners and educate the community in landlord and tenant relations.

Established in 1975 and operating as a non-profit, LSHC has assisted thousands of small landlords across Ontario understand their rights and responsibilities as housing providers and learn how to navigate tenancy-related conflicts and disputes. The client community served by LSHC is comprised of secondary rental market landlords who rent a portion of their home to generate the income needed to supplement the cost of ownership. These small landlords/homeowners are vital to Ontario's housing landscape and make a significant contribution to the affordable housing sector.

In a 2016 study commissioned by LSHC¹, the estimated breadth of the secondary rental market in Ontario, was 495,440 and 574,962 dwellings, with approximately 30% of these units existing as part of a condominium. The study also projected the secondary rental market would grow by 10% between 2016 and 2026, or by 51,214 units as a best case scenario over the next five and ten year periods on a provincial and regional basis (except the north, where it will be relatively stable).

The report defined the 'secondary rental market' as:

- Rented single-detached houses;
- Rented double (semi-detached) houses (i.e.. two units of approximate equal size and under one roof that are situated either side-by-side or front-to-back);
- Rented row/town homes that are part of properties with one or two residential units;
- Rented condominium apartments;
- Rented duplex apartments (i.e. one-above-other);
- Rented accessory apartments (one or two separate dwelling units that are affiliated with another dwelling type and may or may not be within or attached to other dwellings or buildings);
- Two rented units in a triplex; and

¹ https://landlordselfhelp.com/media/LSHC-Secondary-Rental-Market-Research-Report_November-2016.pdf

- One or two rented residential units that are affiliated with or have been converted from a commercial or other non-residential structure (which may or may not be attached to other buildings).

It is the position of LSHC to support the recommendations made by the Ontario Housing Affordability Task Force which could support opportunities for the creation of missing middle housing. The recommendations include:

- Allowing “as of right” residential housing up to four units and up to four storeys on a single residential lot, and
- Permitting “as of right” secondary suites, garden suites, and laneway houses province-wide.

1. What are the biggest barriers and delays to diversifying the types of housing built in existing neighbourhoods?

- ✦ All 3 levels of government must work together effectively and efficiently to pass pertaining legislation and allow the recommendations made by the Ontario Housing Affordability Task Force.
- ✦ Public policy must support the expeditious development of affordable housing projects.

2. What further changes to the planning and development process would you suggest to make it easier to support gentle density and build missing middle housing and multigenerational housing, in Ontario?

Currently, according to the *Planning Act*, municipalities are required to establish official plan policies and zoning bylaw provisions that permit the creation of missing middle housing in detached, semi-detached and row houses, as well as in ancillary structures.

Municipalities must undertake a review of existing bylaws and planning procedures to remove any barriers that would block the development of missing middle housing. Barriers such as prohibiting the addition of secondary units in houses that are less than five years in age; prohibiting permission for secondary units in certain types of houses, such as townhouses; and reviewing barriers such as on-site parking requirements in favour of street parking or other alternatives.

The development charges to create a secondary rental unit can cost as much a \$40,000, this represents a portion of the costs a homeowner would incur. Municipalities should develop and implement programs that provide support for owners willing to add missing middle housing. Such as permitting the deferral or waiving of development charges or fees.

Further, municipalities can create and implement programs that support homeowners by offering funding, grants, forgivable loans, and low-interest loans that will help the owner reduce the cost of creating missing middle housing. Measures such as these will promote the idea of creating and operating an income suite and will encourage more owners to pursue the opportunity of rental housing development.

The City of Toronto provides an excellent example of its robust approach to increasing the supply of housing through its laneway suites and garden suites initiatives and documented in

the Changing Lanes Report¹ as well as programs which promote these policies and offer the option of financial support² to owners.

At a federal level, LSHC believes that strict timelines should be established for the federal investment of \$2.5 billion and the reallocation of \$1.3 billion that has been committed³ to speed up the construction, repair, or support of 35,000 affordable housing units across the country.

3. Are you aware of innovative approaches to land use planning and community building from other jurisdictions that would help increase the supply of missing middle and multigenerational housing?

LSHC is not aware of innovative approaches to land use planning and community building from other jurisdictions but believes that the federal government can further contribute to increasing the supply of affordable housing by making federally controlled surplus land available for the development of housing supply and structure agreements to ensure the land is dedicated for the purpose of supplying missing middle and multigenerational housing. The federal government can require provincial and municipal zoning regulations to be updated to permit increased housing density and expedite the approval process.

4. Are there any other changes that would help support opportunities for missing middle and multigenerational housing?

LSHC is not aware of any other changes that would help support opportunities for missing middle and multigenerational housing aside from what has been mentioned above.

Thank you for the opportunity to participate in this process and offer input on behalf of the small landlord community.

Sincerely,
LANDLORD'S SELF-HELP CENTRE

Silvana Agostino

Silvana Agostino
Executive Director

¹ <https://www.toronto.ca/city-government/planning-development/planning-studies-initiatives/changing-lanes-the-city-of-torontos-review-of-laneway-suites/>

² <https://www.toronto.ca/community-people/community-partners/affordable-housing-partners/laneway-suitesprogram/>

³ <https://www.canada.ca/en/department-finance/news/2021/04/budget-2021-investments-will-create-more-affordable-housing-for-canadians.html>