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**February 26, 2021**

**Via Email only**  
**cpsc@london.ca**

**Attn: Councillor Helmer**

Chair, Community & Protective Services Committee  
City of London  
300 Dufferin Ave  
London, ON N6A 4L9

**Re: Agenda Item 3.3 - Property Standards By-law Review and Motion on Residential Rental Units (Councillors Kayabaga & Salih) - Public Participation Meeting on March 2, 2021**

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Through the Chair and to Members of the Community and Protective Services Committee; please accept the following comments relating to Item 3.3 of the March 2, 2021 Community and Protective Services Committee Agenda; specifically, the correspondence at page 194.

Drewlo Holdings Inc. is one of the largest purpose-built rental providers in Southwestern Ontario. Over its 60-year history, Drewlo Holdings has constructed over 12,000 units in Burlington, Kitchener, London, Sarnia and Woodstock – 9,000 of which are still owned and operated by the company.

**Motion – Residential Rental Units:**

On behalf of Drewlo Holdings Inc., we would like to provide the following comments with respect to the motion put forward by Councillor Kayabaga and Councillor Salih regarding the *Residential Rental Unit Licensing By-law (CP-19)*. We are strongly opposed to the suggested revisions.

As highlighted by Councillor Kayabaga and Salih; apartments, stacked townhouse units and townhouses are currently exempt from the *Residential Rental Unit Licensing (RRUL) By-law*; we feel that this exemption should remain.

Multiple protections are already in place, both Provincially and Municipally. Concerns expressed regarding property standards issues can presently be addressed by the in-force *Property Standards By-law*, which applies to “all property within the City of London” (Section 2.3 Application – All Property, *Property Standards By-law CP-16*). More importantly, all concerns can be brought before the Landlord and Tenant Board (LTB), which was established to address concerns such as this. The LTB assigns residential landlords and tenants rights and responsibilities, and sets out a process for enforcement.

The *RRUL By-law* does not prescribe additional requirements beyond those stated in the motion being discussed, it merely provides the ability to license units. While there is the opportunity to apply “terms and conditions” to a license, we are unsure of what other requirements are being suggested or are desired beyond those prescribed through O.Reg 332/12: Ontario Building Code, O.Reg. 213/09: Ontario Fire Code, the City of London’s *Property Standards By-law* (CP-16), and public health regulations.

The suggested requirement of licensing all units regardless of type and providing random inspections will put an unnecessary strain on Civic resources and ultimately will push housing costs higher and higher to reflect the fees that will undoubtedly accompany licensing.

As stated above, multiple protections are already in place, both at the Municipal and Provincial level. Council should not forget the extensive work completed at the passing of the *RRUL by-law*, which determined purpose built rental (apartment units, stacked townhouse units and townhouses) should not be subject to licensing requirements.

Thank you for considering our feedback as part of the Public Meeting. If there are any questions, please do not hesitate to contact this office.

Sincerely,  
DREWLO HOLDINGS INC.



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**Carrie O'Brien**, Land Planner