



LONDON COMMUNITY ADVOCATES NETWORK

June 8, 2021

Councillor Helmer, Chair
Community & Protective Services Committee
300 Dufferin Avenue
London, ON N6B 1Z2
cpsc@london.ca

Re: Property Standards By-Laws CP-16 & A-35

Dear Councillor Helmer and Members of the Committee

The London Community Advocates Network (LCAN) is comprised of numerous organizations serving recipients of Ontario Works and Ontario Disability benefits as well as other low income Londoners. Co-Chairs Mike Laliberte, of Neighbourhood Legal Services, and Jacqueline Thompson, of LIFE*SPIN, are submitting this on behalf of the LCAN. We meet with the group on a quarterly basis, and with staff from both program areas, to provide input regarding local issues and policies affecting the vulnerable populations that we serve. The concerns regarding vacant properties and property standards have been part of our discussions for more than a year and, at our May 27th meeting, we noted the Co-Chairs would send a letter from us in this regard. The network agencies are keenly aware of the difficulties low-income Londoners face and, thus the London Community Advocates Network would like endorse the recommendations put forward in the May 17 Report to Council by the Western students working with LIFE*SPIN. The submission was moved to the CPSC report; however, the submission, nor its recommendations, were not provided an avenue for follow-up.

We understand that with the Covid-19 pandemic, there is an increased pressure on municipalities to manage vital services and programs with more staffing constraints. Despite these constraints, we implore City Council to take needed action in a number of systemic areas of Property Standards Enforcement. During the stay at home order, children living in low-income families were locked in homes that were unsafe to live in. **We implore, that when Covid-19 restrictions are lifted, that inspections of mapped properties become a priority.** As our community begins to recover, there will be fallout from two years of no enforcement measures in their homes and to begin with, we would like to make the following recommendations in relation to current issues before the CPSC and Council on property standard issues and vacant properties.

1. Access to Information

As noted in the May 17th Report to Council, the by-law changes do not recognize nor address the tenant's right to access information about the lack of safe living conditions in their homes. Tenants residing in units that do not meet property

standards should be viewed as a party and given notice of bylaw breaches and hearings. They are the party most impacted by property standards breaches. All tenants living in a property that does not meet the community standards detailed in the bylaw should receive a copy of current enforcement orders and notification of appeals submitted in this regard. The May 17th Report to Council provides a clear picture of the dangerous and unhealthy conditions where poor families live, as well as the prevalence of these conditions throughout our community. At the public participation meeting regarding CP-16, staff noted that it would be easy to provide tenants copies of enforcement orders when they are issued. This will enable the tenants to take appropriate measures to protect their families and seek reimbursement through the Landlord & Tenant Tribunal process available to them. We request that this practice be implemented without delay.

2. Unlicensed & Unfit Housing

How will you address the loss of housing when enforcement staff identify homes where people should not be living?

Low income families living in substandard housing are already reticent to report their living conditions for fear of reprisal that includes the loss of their housing. The City needs a plan to relocate them to safe living conditions while the enforcement process unfolds. Temporary housing needs to be designated for families to live in, in their neighbourhoods. This will require the Housing staff to work with Enforcement staff to develop a plan.

The City has the power to undertake the repairs to bring these units up to the standards detailed in the Bylaw and to bill the property owners for the repairs. The costs to the City can be recovered when appropriate steps are taken by the City regarding Title and the sale of the property. The Bylaw was recently updated with the addition of fines, however it did not address the need to move tenants to safe housing, while the City takes action to rectify the violations, and return the tenants to their homes, at the same rent, when the work is completed.

Inclusionary Zoning could include temporary units for this purpose, rent supplements could be designated, and London Housing could be utilized, however an Affordable Housing Plan needs to be developed with a multi-layered approach to address the spiralling effect of the housing market and lack of enforcement capacity for an extended period. Our Network is well placed to assist the City in identifying the overlapping barriers impacting the low-income families we serve.

3. Vacant Property

Fewer affordable housing units are available as a result of other ongoing pressures within London. We are aware that many private investors are purchasing affordable housing units, renovating them, and then requesting higher rents. We are also aware of properties being purchased by developers and holding companies and left vacant for many years. Not only does this lower the availability of affordable housing, it also drives market rents higher.

In addition to the capacity to issue fines for not maintaining vacant properties, the municipality could take a more proactive approach to making it less appealing to property owners to leave homes vacant. Slapping plywood over the windows does not meet the standards outlined in the bylaw. Again, the City has the authority to complete the repairs to bring these properties up to standards detailed in the bylaw.

Why should taxpayers bear the burden of the costs for ongoing inspections of properties that are clearly not secured according to our community standards and the costs and risks of sending the Fire Department to these properties. When the property standards are enforced, there is less likelihood that they will be left vacant to deteriorate, particularly when there is a substantial cost for property owners to secure them appropriately. Some municipalities are taking a more proactive approach, including levying additional taxes on vacant properties.

In conclusion, we ask that the issues of low income Londoners be taken fully into account when the 're-opening' plan begins to address the unsafe conditions people have been confined to during the stay at home orders. The time for Council to act on property standards issues is now. We submit that these be approached systemically and be prioritized by staff, including a budget to safely house the tenants and proactively enforce the property standards repairs. These are necessary to maintain our current affordable housing stock and protect the most vulnerable families in our community.

Respectfully,

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