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**VIA EMAIL: CPSC@london.ca**

Chair and Members  
Community and Protective Services Committee  
City of London  
300 Dufferin Avenue, PO Box 5035  
London, Ontario, N6A 4L9

Dear Chair and Members:

**Re: Property Standards Matters; September 21, 2021 Committee Meeting**

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We are the lawyers for the London Property Management Association (“LPMA”). The LPMA is committed to promoting education and professionalism among its more than 550 members. The vast majority of LPMA members are builders, owners and operators of multi-residential rental properties in London. LPMA is Ontario’s oldest regional landlord association and its mandate is to educate its members to administer and manage their rental properties to meet all statutory and professional standards, including full compliance with London’s Property Standards By-laws as well as the provisions of the *Residential Tenancies Act* (RTA). The submission below is with respect to Item 2.4 on the Committee’s agenda, supporting the analysis and recommendation of City Staff with respect to the question of expanding Landlord Licensing and supporting the goals and Terms of Reference of the Landlord Tenant Taskforce.

LPMA supports the recommendation of City Staff that there be no expansion of the Landlord Licensing By-law (“the By-law”) to all rental units in the City of London. It is noteworthy from the Staff report that of 45,000 property standards complaints last year, only 7% involved rental housing at all. We have also reviewed staff’s report to the Planning Committee from May 26, 2008 where it was reported that of all maintenance complaints received by the City about rental properties at that time, 85% involved single family rental properties and only 5% involved rental properties with more than 4 units. Extrapolating from those numbers, 7% of 45000 complaints works out to 3150 complaints about rental housing and 5% of that number (attributable to rental properties with more than 4 units) works out to 158 complaints. It is submitted that it would be an abdication of Council’s responsibility to London taxpayers to create and implement the costly expansion of the current licensing by-law to all multi-res properties in London; hire the dozens of staff required to administer it; hire the additional management staff for oversight of the expanded bureaucracy; impose on all multi-res landlords in London a third layer of regulatory maintenance standards; and, ensure that the inevitable license fees (the “Tenant Tax”), will be passed through to tenants. LPMA respectfully suggests that a more prudent approach to deal with about 158 complaints would be to hire, on a part time basis, one Property Standards By-law enforcement officer.

The numbers above also reflect another important consideration: the vast majority of purpose built apartment units in London are built, managed and operated in accordance with rigorous

statutory requirements to ensure life safety and proper housing standards are in place. The statutory codes applicable to such properties require mandatory Fire, Building, Electrical and Maintenance inspections and compliance with all retrofit legislation. The numbers above bear out the fact that maintenance issues are relatively rare in purpose built multi-res developments and that where they occur, enforcement of existing City By-laws by current City staff is the most prudent, cost-effective way of dealing with them. This is particularly the case where the Property Standards By-law has been substantially enhanced and the menu of fines for property standards deficiencies has been greatly expanded and increased to help fund City revenues in circumstances where non-compliance is found to occur.

On the question of the recommendation for establishing the Landlord and Tenant Taskforce and the terms of reference for same, LPMA supports the goals expressed by staff. In particular, LPMA supports a process where facts to support practical solutions to ensure that applicable housing standards are complied with by both landlords and tenants. We also welcome the opportunity to better educate other housing groups to lease to evidence-based conclusions about housing conditions and not misinformation. As such, LPMA welcomes the opportunity to participate in the Taskforce and to engage in a productive dialogue with stakeholders so that informed decisions and strategies can be developed to improve rental housing in the City.

Thank you, in advance, for your consideration of the submissions of LPMA.

Yours very truly,

**COHEN HIGHLEY** LLP



signature electronically affixed

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cc: LPMA