

TO: Members of London City Council Community and Protective Services Committee
FROM: Samuel Trosow
RE: CPSC Agenda; June 21, 2022; Item 2.4

It was with disappointment that I read the recommendations contained in the Staff Report appended to Item 2.4 entitled "RentSafeTO" Program and Complaint Process Improvements. I urge you to take immediate action in the remainder of your term to address the persistent problems that remain in the city's rental housing policies.

Londoners deserve safe, secure and fair housing and there are many areas where London can make a difference in the lives of its residents and in the quality of the city's rental housing stock. Two items warrant your immediate attention: the expansion of the coverage of the Rental Licensing By-Law, and the development of an enhanced enforcement framework.

Rental Licensing By-Law

As the staff report indicates, the initial focus was limited to low density forms of housing exclusively, as this was where most property related complaints arose. It is not clear from various staff reports whether this analysis of complaints has changed, nor whether the complaints-based system is any longer an effective means of measuring this issue.

At the very least, this information could have been updated. Our community needs a new and balanced approach rather than continuing the limited coverage of the licensing program. It is simply not enough to do things the same way because that's the way we have always done it, nor is it an effective approach to creating responsive policy. This is why an enhanced licensing program is well justified as part of the city's jurisdiction and London's Council has broad authority to make these changes from time to time.

A RentSafe London enforcement program should be adopted

Related to the coverage of licensing requirements, London needs an expanded and enhanced framework for code enforcement and public education. While tenants have the opportunity to pursue provincial remedies for inadequate housing conditions, there is ample evidence that the provincial tribunal is significantly backlogged and is often inadequate in responding to our most vulnerable populations. This is where the broad authority of municipalities regarding health, safety, and environment comes into play. Like other Ontario cities, London has very broad powers in the area of housing code enforcement that it is not using during a time when we have a housing crisis.

Similar to the *RentSafe TO* program in Toronto, a *RentSafe London* program can provide measurable and direct benefits to residents of London in a cost-effective manner. If the complaint process is improved, and building audits undertaken, then the public will have confidence that their concerns about housing conditions are being addressed by Council. Sadly at this time that public confidence is seriously lacking.

Conclusion

Londoners deserve the coverage of an updated Residential Rental Unit Licensing By-law. Much has changed since it was first adopted over a dozen years ago, and its limited scope is

contributing to gaps in enforcement, weak public education and a lack of public confidence. Together with an expanded framework for addressing the persistent problems of the enforcement of housing standards, this Council can finally take effective measures to ensure the health, safety and environmental needs of all London residents.

As a Londoner who has worked with these issues, I urge you to return the staff report with directions to (1) bring forward an amendment to the licensing by-law to expand its coverage to include multi-unit buildings; and (2) bring forward a by-law to adopt an expanded *RentSafe London* housing enforcement program.

Thank you for your attention to these crucial issues.

Samuel Trosow