

**A SUBMISSION TO
THE STANDING COMMITTEE ON SOCIAL JUSTICE
FROM THE SANDYCOVE ACRES HOME OWNERS' ASSOCIATION
IN RESPECT OF**

Bill 184

**An Act to amend the Building Code Act, 1992, the
Housing Services Act, 2011 and the Residential Tenancies Act, 2006 and to
enact the Ontario Mortgage and Housing Corporation Repeal Act, 2020**

Background: Located in Innisfil, Sandycove Acres is a Land Lease community with 1233 homes and approximately 1800 residents who are primarily Seniors and/or retired persons. The Association has both formal and informal relationships with at least 10 other Land Lease communities whose residents are a similar demographic and who have expressed similar concerns to our own with respect to Bill 184.

Throughout Ontario many Land Lease communities have been marketed specifically to Seniors – this is the case both with ourselves and the above mentioned communities. The financial structure of these communities is attractive to Seniors; this is especially true for those on limited and/or fixed incomes.

Submission: This submission is made in respect of Schedule 4 of the proposed bill and in particular the changes in respect of Above Guideline Increases as outlined with respect to the repeal and substitution of subsection 167(1) of the Residential Tenancies Act.

It is our submission that the current provisions for Above Guideline Increases, the impact of which are compounded financially by the provincially set Guideline Increases, are already proving a burden for many seniors. Indeed we are already aware of residents of our communities being forced to sell their homes due to the cumulative effect of increases permitted under the current legislation.

It is our belief that the proposed rules will, by allowing larger percentage increases applicable in a greater number of years for infrastructure expenditure, accelerate this trend for our residents. This both in respect of residents losing their homes and others being forced to choose between paying their rent and providing the necessities of a decent life in their remaining years.

We therefore respectfully request that the proposed amendments with respect to Above Guideline Increases be removed from the proposed legislation.

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