



Advocacy Centre for Tenants Ontario
Centre ontarien de défense des droits des locataires

425 Adelaide St. West, 5th floor, Toronto, Ontario M5V 3C1
Phone: 416-597-5855 1-866-245-4182 Fax: 416-597-5821
www.acto.ca

October 10, 2012

Planning and Growth Management Committee
10th Floor, West Tower, City Hall
100 Queen St. West
Toronto, Ontario M5H 2N2

Dear Chair and Committee members,

Re: Draft City-Wide Zoning By-law (Agenda Item PG18.7 for October 12th meeting)

We are writing to express our deep concern about two proposals in the draft revised city-wide zoning by-law. Our first concern is about the maintenance of the existing zoning treatment of rooming houses and the inconsistencies it creates between the former municipalities that make up the city of Toronto. The second concern is around the minimum distancing provisions affecting group homes and the negative impact that provision has on the right of City residents to equal treatment in housing without discrimination on the basis of disability.

ACTO is a community legal clinic, funded by Legal Aid Ontario, with a province-wide mandate. We work for the advancement of human rights and social justice in housing for low-income Ontarians. We provide legal representation in respect of housing law, particularly where there is an important public interest affecting economically-disadvantaged people such as low-income residential tenants in Toronto.

ACTO has consistently advocated for a Consolidated City-Wide Zoning By-law that permits rooming houses in all residential zones, provided they meet all other requirements of that designation. Rooming houses are clearly a residential use. We do not believe that there is credible planning evidence that unrelated people living together constitute a more intense use of land and buildings than a "family", however that might be defined. We have suggested other ways, more in keeping with City policies that promote affordable housing in all neighbourhoods, to deal with owners and tenants who engage in anti-social conduct. We have also pointed out that a significant proportion of the existing licensed rooming houses provide homes for people with disabilities. Excluding such accommodation from vast areas of the City clearly raises further human rights concerns.

ACTO requests that the Committee reiterate its earlier direction to Planning staff to expeditiously carry out the work needed to produce a final report on rooming houses so we can move forward on this issue as part of the city-wide zoning by-law. You may

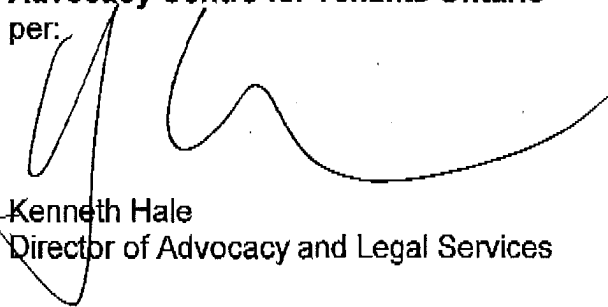
recall that on January 6, 2010, the matter of rooming house zoning was deferred to allow for consultation on the city staff's proposed zoning approach. A final report was to be submitted to your Committee by November 2011. In his report to Council on April 8, 2011, the City's Chief Planner advised that consultation on rooming houses would not be completed if City Council proceeded with the preparation of the revised city-wide zoning by-law which is now before your Committee.

As for the unnecessary and possibly illegal restrictions on the location of group homes, there is no credible planning evidence that they do anything to improve or protect Toronto's neighbourhoods. But it is obvious that they add to the difficulties in creating and maintaining shared, supervised homes for people with disabilities. These restrictions should be removed.

Thank you for your consideration of these issues. ACTO looks forward to participating in further discussions with you and to continuing to work with you on issues affecting Toronto's low-income tenants.

Sincerely yours,
Advocacy Centre for Tenants Ontario

per:



Kenneth Hale
Director of Advocacy and Legal Services