

# Rupert

Community Residential Services of Toronto Inc.  
36 Toronto Street - Suite 920 - Toronto - Ontario - M5C 2C5  
tel: 416-367-2900 fax: 416-367-2791

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February 15, 2013

Via Email — pgmc@toronto.ca

City Clerk  
Attention: Frances Pritchard  
Planning and Growth Management Committee  
CITY OF TORONTO  
Toronto City Hall  
100 Queen Street West  
10<sup>th</sup> Floor - West Tower  
Toronto, Ontario M5H 2N2

Dear Ms. Pritchard:

Re: City-Wide Zoning By-law

We refer to the Notice of an Open House and Statutory Public Meeting Concerning the Proposed City-Wide Zoning By-law, issued by the City Clerk on the 23<sup>rd</sup> of January, 2013.

Rupert is submitting its submissions by correspondence. While representatives of Rupert will not be attending to depute, we support the concerns expressed by other organizations with respect to the issue of Rooming Houses.

Attached herewith please find a copy of our letters dated August 11, 2010 to the City Clerk, and December 11, 2009 to Councillor Norm Kelly as the Chair of the Planning and Growth Management Committee. In this respect, we would reiterate the comments and concerns raised in the letters.

In particular, we would emphasize that Rooming Houses are an essential part of the affordable housing spectrum. Indeed, Rooming Houses provide the most affordable housing in the private sector. We express our concern that the draft Zoning By-law does not address permissive zoning for Rooming Houses across the amalgamated city. Further, antiquated zoning still exists for Rooming Houses.

We refer to the Rooming House provisions of the proposed City-Wide Zoning By-law and would offer the following comments and position.

1. We would reiterate our position that Rooming Houses should be permitted as of right, but subject to appropriate licensing and regulation with respect to health and safety standards.
2. The proposed provisions with respect to Rooming Houses are contrary to the provisions of the *Charter* and the *Ontario Human Rights Code*.
3. Similarly, the provisions are not consistent with good planning principles for the City of Toronto. These provisions are not consistent with the Toronto Housing Charter and Toronto's Official Plan Housing Policies.

We wish to thank you for this opportunity to submit a written submission.

We trust that the issues raised by Rupert with the Planning and Growth Management Committee and reiterated in this letter will be given appropriate consideration by Council.

If anyone has any questions in the meantime, please feel free to contact me as a representative of Rupert.

Yours very truly,  
Rupert Community Residential Services of  
Toronto Inc.

Per:



Robert G. Keel — Chair  
RKeel@KeelCottrelle.on.ca

/klk  
encl.

# Rupert

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August 11, 2010

Via Email — pgmc@toronto.ca

City Clerk  
Attention: Merle MacDonald  
Administrator, Planning and Growth Management Committee  
CITY OF TORONTO  
Toronto City Hall  
100 Queen Street West  
10<sup>th</sup> Floor - West Tower  
Toronto, Ontario M5H 2N2

Dear Mr. MacDonald

**Re: City-Wide Zoning By-law**

We refer to the Notice of an Open House and Statutory Public Meeting Concerning the Proposed City-Wide Zoning By-law, issued by the City Clerk on the 29<sup>th</sup> of July, 2010.

Rupert is submitting its submissions by correspondence. While representatives of Rupert will not be attending to depute, we support the concerns expressed by other organizations with respect to the issue of Rooming Houses.

Attached herewith please find a copy of our letter dated December 11, 2009 to Councillor Norm Kelly as the Chair of the Planning and Growth Management Committee. In this respect, we would reiterate the comments and concerns raised in that letter.

In particular, we would reiterate that Rooming Houses are an essential part of the affordable housing spectrum. We express our concern that the draft Zoning By-law does not address permissive zoning for Rooming Houses across the amalgamated city. Further, antiquated zoning still exists for Rooming Houses.

We also refer to section 150.25.1(2) of the proposed City-Wide Zoning By-law and would offer the following comments and position.

1. We would reiterate our position that Rooming Houses should be permitted as of right, but subject to appropriate licensing and regulation with respect to health and safety standards.

2. The proposed provisions with respect to Rooming Houses in 150.25.1(2) are contrary to the provisions of the *Charter* and the *Ontario Human Rights Code*.
3. Similarly, the provisions in 150.25.1(2) are not consistent with good planning principles for the City of Toronto. These provisions are not consistent with the Toronto Housing Charter and Toronto's Official Plan Housing Policies.

We wish to thank you for this opportunity to submit a written submission.

We trust that the issues raised by Rupert with the Planning and Growth Management Committee and reiterated in this letter will be given appropriate consideration by Council.

If anyone has any questions in the meantime, please feel free to contact me as a representative of Rupert.

Yours very truly,  
Rupert Community Residential  
Services of Toronto Inc.

Per:



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Robert G. Keel – Chair  
rkeel@keelcottrelle.on.ca

# Rupert

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36 Toronto Street - Suite 920 - Toronto - Ontario - M5C 2C5  
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December 11, 2009

Delivered

Councillor Norm Kelly  
CITY OF TORONTO  
City Hall - Suite C43  
100 Queen Street West  
Toronto, Ontario M5H 2N2

Dear Councillor Kelly:

**Re: Consolidated Zoning By-law and Rooming Houses**

As you will be considering the new Zoning By-law early in the new year, we write to express our concern that this By-law provide for legal licensed rooming houses as a permitted use in all residential areas. We understand that this has been the subject of consideration and debate both at Council and at the Planning and Growth Management Committee.

Rooming houses provide an alternative and affordable type of accommodation for people of low income who could not otherwise afford a place to call home. Rooming houses should be licensed and regulated to ensure that they meet health and safety standards in order to prevent illness, injury or death, and to otherwise protect the occupants and the community.

This position is consistent with the Toronto Housing Charter, Toronto's Official Plan Housing Policies, and with the Ontario Human Rights Code.

The Housing Charter says:

- all residents should have a safe, secure, affordable and well-maintained home from which to realize their full potential
- all residents should be able to live in their neighbourhood of choice without discrimination
- all residents, regardless of whether they rent or own a home, or are homeless, have an equal stake and voice in Toronto's future
- all housing in Toronto shall be maintained and operated in a good and safe state of repair.

Toronto's Official Plan Housing Policy 3.2.1(1) states:

a full range of housing, in terms of form, tenure and affordability, across the City and within neighbourhoods, will be provided and maintained to meet the current and future needs of residents. A full range of housing includes: ... shared and/or congregate living housing arrangements ...

Clearly, rooming houses are such a form of housing.

Barbara Hall, former Toronto Mayor and now the Chief Commissioner of the Ontario Human Rights Commission, spoke to the Planning and Growth Management Committee on November 4, 2009 about the Human Rights Code. She said that not allowing rooming houses in all areas of the City could be seen as discriminatory. It denies equal access and treatment in housing to a population that is vulnerable in the rental housing market, and therefore imposes a disadvantage upon them. We refer you to the full text of her comments (enclosed). We also refer you to the Ontario Human Rights Commission's Policy on Human Rights and Rental Housing, which states that equality in housing is a priority.

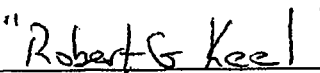
Finally, we ask that you consider the issues raised in the enclosed document prepared by the Rupert Coalition. Rooming houses fill an important need for low-income people in the rental housing market. The City has an obligation to ensure that discriminatory attitudes and stereotypes about the residents of this type of housing do not deny them access to affordable housing. Council must also ensure that this type of housing is safe and in good repair. When rooming houses operate outside the law, the people that live there are vulnerable because they have no legal recourse when problems arise.

We urge the City to include rooming houses as a permitted residential use in all areas of the City where they otherwise meet the standards for size, density and building form. We further urge you to expand the existing licensing and regulatory system to all areas of the City to ensure the safety of the residents that require this type of accommodation.

Thank you for considering these issues, and we look forward to discussing them with you further as the Zoning By-law process unfolds.

Yours very truly,  
Rupert Community Residential  
Services of Toronto Inc.

Per:



Robert G. Keel — Chair