



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

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February 21, 2013

Planning and Growth Management Committee  
10<sup>th</sup> 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 PG21.1 for March 6<sup>th</sup> meeting)**

Further to our letter of October 11, 2012, we remain strongly opposed to the proposal in the draft by-law to maintain the existing inconsistent zoning treatment of rooming houses across the City and the minimum distancing provisions affecting group homes. These proposals have a substantial negative impact on the ability of people who have low incomes or who face other disadvantages to access safe and secure housing. We ask that these issues receive further consideration prior to being put before Council.

**Rooming houses**

We continue to urge you to adopt a Consolidated City-Wide Zoning By-law that permits rooming houses in all residential zones, provided they meet all other requirements of that designation. The proliferation of rental units in all areas of the city that do not meet current zoning restrictions demonstrates the need for the kind of housing that safe, regulated rooming houses could provide. There is no credible planning evidence that unrelated people living together constitute a more intensive use of land and buildings than a "family", however that might be defined. Again, we remind you 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 raises concerns about the compliance of the proposed by-law with the *Ontario Human Rights Code*.

You will recall that this Committee earlier directed the Planning Division to report on a consistent approach to rooming houses so such an approach could be adopted as part of the city-wide zoning by-law. On January 6, 2010, that direction was deferred to allow for consultation. But, on April 8, 2011, you were advised by the Chief Planner that this consultation would not be completed due to Council's decision to proceed with the preparation of the revised city-wide zoning by-law which is now before your Committee. We urge you to carry out that consultation and include changes to the treatment of rooming houses in the consolidated by-law that reflect the current needs of City residents.

## **Group Home Separation Distances**

The proposed consolidated by-law continues to impose unnecessary and possibly illegal restrictions on the location of group homes by requiring a 250-metre separation between group homes or residential care homes. Again, this requirement is not based on credible planning evidence and adds significantly to the difficulties in creating and maintaining shared, supervised homes for people with disabilities. We urge you to remove this restriction in clause 150.15.30.1(1) of the proposed by-law. The recommended change to the definitions of “Group Home” and “Residential Care Home” found in ss. 800.50 (325) and (700) respectively are welcome, but they do not change the fact that these forms of housing are primarily occupied by persons with disabilities. Such persons continue to be protected from discriminatory treatment by the *Ontario Human Rights Code*.

We urge you to give serious consideration to these issues in order to comply with your obligation to the people of Toronto to plan for an inclusive City that recognizes the needs - and respects the rights - of all its residents.

Sincerely yours,

**Advocacy Centre for Tenants Ontario**

per:

*Original signed by,*

Kenneth Hale

Director of Advocacy and Legal Services