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March 4, 2013

Attention: Norm Kelly (Chair)
Planning and Growth Management Committee
City of Toronto
100 Queen Street West
10th Floor –West Tower
Toronto, Ontario M5H 2N2
Email: pgmac@toronto.ca

CITY CLERK'S OFFICE
SECRETARY GENERAL

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SUBMISSION TO PLANNING AND GROWTH MANAGEMENT COMMITTEE
Rooming Houses in the Consolidated Zoning By-law

Dear Norm Kelly (Chair) and members of the Planning and Growth Committee,

We are writing this letter in response 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 23rd of January 2013.

As community advocates who have worked with, interviewed and supported rooming house tenants in Scarborough, North York and Etobicoke we, Regini David (West Scarborough Community Legal Services) and Lisa Freeman (University of Toronto) urge the City of Toronto to legalize suburban rooming houses and include them in your discussions of the city-wide zoning bylaw.

Rooming houses are one of the few forms of affordable housing for low-income people in our suburbs. They provide housing for a wide range of people including: newcomers to Canada, international students, long-term suburban residents, migrant and temporary workers and recipients of OW and ODSP. Tenants are choosing rooming houses, for the most part, out of financial necessity and few are aware of the illegality of their accommodations. Many of the tenants we spoke with want rooming houses to be legal, are nervous to approach their landlords and live in rooming houses as they wait for TCHC housing to become available.

Delaying or avoiding a decision on the regulation of suburban rooming houses will only make the situation worse for some of the city's most vulnerable tenants. Forcing the closure of 'illegal' rooming houses and evicting tenants will increase the precarious and underground nature of this much-needed housing form. Many suburban rooming houses we visited operate in accordance with city standards and many landlords are aware that rooming houses are legal under the provincial Residential Tenancy Act. Meanwhile, less reputable landlords, provide tenants with small basement rooms with no windows, mould and no fire exists. If the City of Toronto continues to turn a blind eye to suburban rooming houses, this form of housing will only deteriorate further and the conditions for an already vulnerable population of tenants will worsen.

The West Scarborough Community Legal Services (WSCLS) has provided legal advice and representation for low-income individuals living in Scarborough for 21 years. One of our main areas is helping low-income tenants. In the past few years, an increasing number of tenants we support live in rooming houses. As legal advocates, we feel that our hands are tied. We

can support tenants, tell them their rights under provincial legislation but cannot help them find adequate support through the City or challenge their landlord out of fear of exposing the illegal house. We are very concerned that the draft city-wide zoning bylaw does not address zoning for rooming houses in the City of Scarborough. There is an urgent need to address the reality of rooming houses in our communities.

Dr. Lisa Freeman's doctoral research on rooming house regulation in Toronto, in the Department of Geography and Planning at the University of Toronto, validates the concerns of the WSCLS. Her doctoral research, based on 75 interviews with tenants and housing workers throughout the City of Toronto, concluded that suburban rooming houses are increasing in numbers and home to a majority of the City's 'hidden homeless' population. Her research noted that suburban rooming houses differ substantially from downtown rooming houses (which have been licensed and regulated for over 30 years). Suburban rooming houses are located in newer monster homes, older bungalows, converted basement apartments, townhomes and in illegal sublet situations in apartment buildings throughout Scarborough. We should not wait until tenants are dying in rooming house fires (as occurred in the 1970s) to regulate this form of housing.

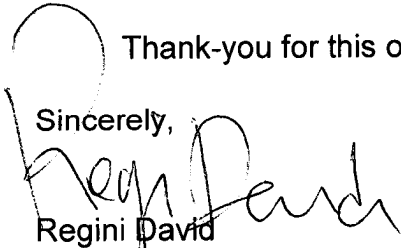
Rooming houses are rarely a tenant's first choice for housing, but often, a rooming house is their only option. As the need for affordable housing in this city increases, so to will the number unregulated, illegal and precarious forms of housing. Passing up an opportunity to address the situation of suburban rooming houses will only leave rooming house tenants even more vulnerable. Unregulated illegal rooming houses will continue to grow as long as rooming houses are not recognized in the zoning by-law.

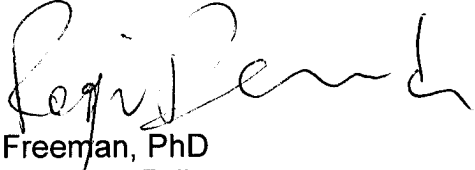
Unfortunately we, or representatives from WSCLS, are not able to attend the deputation, we support the concerns expressed by other organizations in regard to the matter of rooming houses. We have attached copies of our letters to City Clerk and Councillor Norm Kelly, Chair of the Planning and Growth Management Commitment (dated August 19, 2010). We are voicing our concerns alongside and in support of letters writing from members of WSCLS, the Scarborough Anti-Poverty Coalition (see attached) and the Advocacy Centre for Tenants Ontario (ACTO). And, we have supported suburban rooming house tenants to vocalize their concerns in a short video that will be available on community organizations' websites by mid-March 2013.

We urge you to give serious consideration to the situation of suburban rooming houses. Making rooming houses legal will be one step towards ensuring safe and affordable rental housing for *all* tenants in our city. The issues we have addressed, and we hope are discussed at the meeting, are important for people who are directly affected and for community organizations that work with marginalized tenants.

Thank-you for this opportunity to share our observations, research and, concerns.

Sincerely,


Regini David
Community Legal Worker
West Scarborough Community Legal Services


for Lisa Freeman, PhD
Post Doctoral Fellow
Simon Fraser University, B.C

SCARBOROUGH ANTI --- **POVERTY COALITION**

To: Councillor Paul Ainslie. councillor_ainslie@toronto.ca
Councillor Michelle Berardinetti. councillor_berardinetti@toronto.ca
Councillor Raymond Cho. councillor_cho@toronto.ca
Councillor Gary Crawford. councillor_crawford@toronto.ca
Councillor Glenn De Baeremaeker. councillor_debaeremaeker@toronto.ca
Councillor Mike Del Grande. councillor_delgrande@toronto.ca
Councillor Norm Kelly. councillor_kelly@toronto.ca
Councillor Chin Lee. councillor_lee@toronto.ca
Councillor Ron Moeser. councillor_moeser@toronto.ca
Councillor Michael Thompson. councillor_thompson@toronto.ca

Date: January 22, 2013

Re: Rooming Houses and the Draft City-Wide Zoning By-law

Dear Scarborough Councillors:

The Scarborough Anti Poverty Committee exists to raise awareness of poverty issues in Scarborough and to promote solutions.

We understand that the City has not addressed the varying by-laws regarding rooming houses in its latest draft on citywide zoning. This is disappointing.

Toronto should have one by-law for rooming homes. It should recognize that rooming homes are a residential use and promote affordable housing of a reasonable quality. It should ensure that all rooming homes are held to the same standards and that tenant rights are respected.

The Advocacy Centre for Tenants Ontario is requesting that Planning staff carry out a final report on rooming houses for consultation. We agree, and ask that you direct planning staff to do so.

Thank you for considering our views.

Israt Ahmed
Chairperson.

**SUBMISSION TO PLANNING AND GROWTH MANAGEMENT
COMMITTEE**

Rooming Houses in the Consolidated Zoning By-law

AUGUST 19, 2010

I am writing on behalf of the West Scarborough Community Legal Services

For over 21 years, we have provided legal advice and representation on laws relating to poverty for low income persons in Scarborough. One of the major areas of our work is helping low income tenants.

We believe Affordable Housing is one of the primary ways to help low-income people out of poverty. We know that rooming houses are very important to keep people off the streets and provide affordable homes for many low income individuals. We are very concerned about the draft zoning by-law which does not deal with zoning for rooming houses across the amalgamated city to address the reality and need of rooming houses in our neighbourhoods.

We have interviewed and worked with many rooming house tenants and landlords across the city to produce a video to build awareness about the need for regulating and legalizing rooming houses across the city. I had the opportunity to visit many rooming houses. These rooming houses are created in many forms, for example: buildings, basement apartments, bungalow homes, two storey homes, townhomes and large new luxury homes. Some rooming houses are well-run rooming houses and some are unsafe rooming houses but they are in our residential areas, in suburbs and throughout our city. These homes are mainly occupied by many new immigrants, low income tenants, students and people with disabilities.

We are very disappointed to see that the committee is not addressing the needs of the low income tenants and the realities of the rooming houses in our neighbourhoods immediately and properly. We strongly believe that the rooming houses should be legally allowed, monitored in our neighbourhoods and across the city. In order to address the realities of rooming houses, including fair treatment for disadvantaged groups, the committee should deal with this important issue immediately and vote down the draft city by-law. Excluding rooming houses from residential neighbourhoods violates the OHRC. The Toronto Housing Charter says: "All residents should be able to live in the neighbourhood of choice without discrimination"

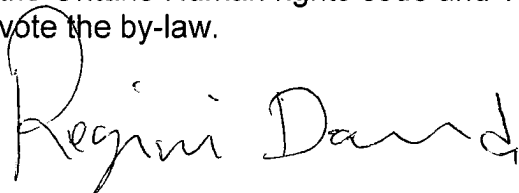
The current and the draft city by-laws target people who are most marginalized, most vulnerable and most in need. According to the United Way Report, Scarborough saw a 136% increase in the number of "poor families" between

1981- 2001. Further, according to the Shared Accommodation, June 2008 report, there are over 165,000 low income single adults in Toronto, for most of whom, rooming houses are the most affordable option. Ontario Human Rights Chief Commissioner Barbara Hall informed City of Toronto Planning and Growth Management Committee that the City by-law has the potential to violate the Ontario Human Rights Code.

Delaying or avoiding decisions on this important issue will not make it go away. It will simply leave tenants and their neighbourhoods vulnerable to those who would work outside the laws that aim to keep our City healthy. Unregulated illegal rooming houses will continue to grow as long as rooming houses are not recognized in the zoning by-law.

This is an important issue for people who are directly affected and for grassroots community organizations that are working with marginalized individuals. I am presenting a petition signed by hundreds of Toronto residents demanding that the city of Toronto allow licensed, regulated rooming houses all across the city. (Will be presented during the deputation on August 19, 2010)

Finally, I request the councillors to consider the realities of marginalized people who need these homes, to address this in our neighbourhoods, and to respect the Ontario Human rights code and The Toronto Housing Charter before you vote the by-law.

A handwritten signature in black ink that reads "Regini David". The signature is written in a cursive, flowing style.

Regini David
Community Legal Worker
West Scarborough Community Centre