

September 4, 2019

Sent via email to: [ecdc@toronto.ca](mailto:ecdc@toronto.ca)

The Clerk  
Economic and Community Development Committee  
Toronto City Hall, 10th Fl. W, 100 Queen St. W.  
Toronto ON M5H 2N2

Dear Sir/Madam:

Re: Implementation of Coroner's Recommendations from Inquests; Item EC7.10

I am writing on behalf of the Advocacy Centre for Tenants Ontario (ACTO), a community legal clinic, funded by Legal Aid Ontario. We assist low-income Ontarians through legal advice and representation, law reform, education and training, and community organizing. We represented a number of intervening parties at the Faulkner Inquest and have some recommendations to add to the recommendation of the General Manager, Shelter, Support and Housing Administration.

We ask that this committee do more than receive this report and forward it to Council. As Cathy Crowe's submission to you points out, there have been over 200 homeless people that have died since the beginning of 2015. This is a tragedy that requires a more robust response.

### **Rooming Houses**

The Coroner's jury recognized that rooming houses are an affordable form of housing that provides people with a community of support that helps them access the community services that can keep them alive. A focus of the Faulkner Inquest was the dearth of affordable housing in Scarborough that could be alleviated by recognition and support of multi-tenant houses. However, the City continues to hold to its position in our appeal before the Local Planning Appeal Tribunal (LPAT) that these homes should be excluded from most residential neighbourhoods. Rather than addressing this vital community need, Council has deferred to the LPAT, in diametric opposition to its position on most other development issues. Two rounds of community consultation have been completed two years ago and reports are still being written.

**We urge you to recommend to Council that the Planning and Legal Divisions of the City be directed to bring forward a proposal to permit multi-tenant houses in all residential zones.** It's time to bring to an end the empty consultations and the legal wrangling at the LPAT.

In a related matter, the Official Plan policy amendments aimed at protecting dwelling rooms have been appealed to LPAT by developers. **We urge you to recommend to Council that these amendments be strongly supported at the appeal.**

**Preserving City Services to Homeless People.**

While striving to meet the housing needs of everyone who lives in the City, the enhanced services that have been implemented to address a growing shelter crisis must be continued. **The call for additional funding to sustain the services provided in response to recommendations 5, 17 and 21 should be supported by this Committee. We ask you to recommend to Council that this additional funding be made available as part of the 2020 City Budget.**

We believe that there has been a serious failure to address Recommendation 2 – to improve co-ordination with other responsible parties including the Ministries of the Ontario Government. We would note that the province is “pausing” its requirement to conduct local homeless enumeration. The Ministry of Municipal Affairs and Housing claims that “the environment in which the enumeration approach was first conceived has changed” and it can be expected that this pause will be a permanent one. **We ask that you recommend to Council that the City fund and carry out the Street Needs Assessment for 2019.**

Thank you for your consideration of our submissions.

Yours very truly,

**Advocacy Centre for Tenants Ontario**

per:



Kenneth Hale,  
Director of Advocacy and Legal Services