

March 15, 2019

Sent via email: phc@toronto.ca

Planning and Housing Committee
City of Toronto,
10th floor, West Tower, City Hall
100 Queen St. West
Toronto, Ontario M5H 2N2

Dear Chair and Committee members,

Re: Zoning Revisions for Municipal Shelters (PH3.2)

I am writing on behalf of the Advocacy Centre for Tenants Ontario (ACTO) to inform you of our support for the proposed zoning by-law revisions to be considered by the Committee at its March 20th meeting. ACTO is a community legal clinic funded by Legal Aid Ontario to provide legal services to low-income tenants across Ontario on the systemic issues that affect their ability to provide and maintain decent homes for themselves and their families. We urge the committee to adopt this by-law amendment to help facilitate the provision of municipal shelters in all areas of the city.

The current zoning by-law permits municipal shelters as-of-right in most zones, subject to two conditions: a 250-metre separation distance from another shelter and a requirement to be located either on a major street or on an intersecting street as long as the lot is within 80 metres of the major street. ACTO believes that these restrictions undermine the intent of the bylaw to increase as-of-right permission for shelters across the city. These by-law restrictions have no planning rationale, are unsupported by objective planning evidence and are unnecessary in light of Council's comprehensive "due diligence" process.

A one-size-fits-all distancing requirement does not reflect the diversity of land uses across the city, the different accessibility to services such as transit, or the potential compatibility of surrounding land uses. In fact, depending on the size, location, and type of shelter, a clustering of social and or emergency housing could have the effect of supporting an appropriate level of co-located social services. Distancing requirements could force a shelter to be located further from needed social services that might be already available in the vicinity of an existing shelter, hostel or crisis care facility. The right approach should be to put services where they are required throughout the City, without imposing inflexible zoning restrictions that would prevent additional housing services downtown, if there is still unmet need there, as well as in currently unserved areas.

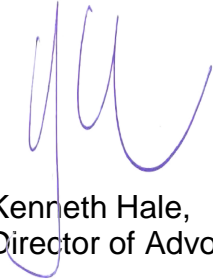
Similarly, there is no planning rationale for the location restriction regarding a major road. The arterial roads requirement is not needed to protect the character of residential neighborhoods because there are already size and height restrictions which prevent large shelters from being located inside residential neighbourhoods. The location of shelters on arterial roads will not necessarily make it easier for residents to access transit and other services. Even shelters located on a transit line would not necessarily be located at stops, so the user would have to walk to the station or bus stop.

ACTO supports the proposal to remove the minimum separation distancing and the arterial road restrictions. These restrictions unnecessarily reduce the number of sites that can be considered for shelter development and limit the effectiveness of the by-law in meeting the intent of the original Council direction, which was to permit as-of-right location of municipal shelters across the entire City of Toronto. Removing these restrictions will facilitate the much-needed expansion of municipal shelters as an important short-term response to our homelessness crisis.

Yours very truly,

Advocacy Centre for Tenants Ontario

per:



Kenneth Hale,
Director of Advocacy and Legal Services