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Rooming houses in Toronto, 1997–2018

Philippa Campsie

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Executive Summary

In 1998, amalgamation brought together six cities to form the new City of Toronto. Rooming houses had been permitted and licensed since the 1970s in the former City of Toronto, which became the core of the amalgamated city. In the former cities of Etobicoke and York, they were permitted to some extent, but in the former cities of North York, East York, and Scarborough, rooming houses were not permitted.

Twenty years later, despite repeated attempts to extend rooming house zoning and licensing across the amalgamated city, the bylaws of the former cities respecting rooming houses remain in force. Although rooming houses exist outside the areas in which they have long been permitted and regulated, those in North York, East York, and Scarborough cannot be counted or monitored. In the core of the city, rooming house numbers are declining; some have been demolished, and others, including residential hotels, have been converted to other uses.

The City of Toronto has commissioned several rooming house studies since amalgamation, held many public consultations, and amassed a considerable body of knowledge on the subject. A “pilot project” (lasting about 10 years) in the Parkdale neighbourhood was able to bring about 80 “bachelorettes” into compliance with zoning and licensing bylaws, but the process was time-consuming and expensive and may not offer a workable model for licensing currently unlicensed rooming houses elsewhere.

Meanwhile, the context has changed. The aging of the population, the role of the Internet in commercial transactions, rising rents and property values in the central city, the changing geography of poverty, the expansion of suburban college and university enrolment, and even climate change (causing hotter summers) have all affected the rooming house sector. Some things, however, have not changed: the lack of affordable housing and adequate shelter for all residents of the city, the difficulty of maintaining older buildings as inexpensive housing, and the recurrence of rooming house fires.

Rooming houses, whether licensed or unlicensed, present an important question of human rights. On the one hand, the current licensing regime, where it is in force, gives homeowners considerable control over the lives of renters in their neighbourhoods. On the other hand, the lack of licensing in some parts of the city creates spatial inequities: shared housing in such areas is not subject to safety inspections. Resolving these issues will not be easy. It remains to be seen whether the City can successfully extend rooming house regulation while maintaining this essential form of accommodation for low-income tenants.

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Author

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1. Introduction

The so-called “Commonsense Revolution” of the Ontario Conservatives, who won the provincial election in 1995, ushered in a period of change that included the cancellation of social housing initiatives, the reduction of welfare rates, and revisions to rent controls and landlord and tenant law. These changes had immediate, drastic effects on low-income renters (Campsie 1996).

A further change that took effect on 1 January 1998 was the forced amalgamation of Metro Toronto and its six constituent municipalities. Toronto was not alone – the Conservative government reduced the number of Ontario municipalities from more than 800 to fewer than 450. The Toronto amalgamation was widely opposed by municipal politicians and the public at large. There were street protests against the “Megacity” and 548 citizens made depositions in February 1997 at Queen’s Park (Milroy et al. 1999). Most of those who spoke (although not all) argued that amalgamation would not save money as the Conservatives claimed it would, and that it would make municipal government less accessible and responsive to city residents. Nearly 20 years later, it is clear that amalgamation did not lead to cost savings, although it may have had some other economic benefits (Slack and Bird 2013). Moreover, the promise that all the former municipalities would be treated equally, with uniform service levels and consistent regulations in all parts of the city has not yet been fulfilled.

The story of rooming houses in the amalgamated City of Toronto is just one example of the difficulty of unifying different approaches to regulation in the six former cities, each of which retains some elements of its older, unique municipal culture, embedded not only in bylaws, but in residents’ expectations about what those bylaws should be.

One of the challenges facing municipal planning staff in the amalgamated city was the development of a “harmonized” zoning bylaw. The six cities in Toronto had developed very different standards for zoning, which regulates both land use and urban form, as well as for licensing. Rooming houses were permitted and licensed in the former City of Toronto, permitted but not licensed in York, permitted but subject to very restrictive regulation in Etobicoke, and not permitted or licensed in Scarborough, North York, or East York.

A new zoning bylaw was approved by Council in 2009, but it still did not allow rooming houses in North York, East York, and Scarborough. The Advocacy Centre for Tenants Ontario (ACTO) appealed the rooming house provisions of the bylaw on the grounds that the city had no planning justification for continuing to treat rooming houses in the former cities in different ways

(Hale 2010). The entire zoning bylaw was repealed in 2011, and sent back to the planning department for further study and consultation. A new zoning bylaw was introduced and approved in 2013. In this new version, the provisions for rooming houses were simplified somewhat, but the differences among the former cities remained. Since the appeal of the original rooming house provisions was still before the Ontario Municipal Board and ACTO had the same objection to the new zoning bylaw, the rooming house section could not be implemented and the old pre-amalgamation zoning provisions remain in force.

In 2014, the Toronto Executive Committee and City Council called for a review of rooming houses, hoping to find a new approach to regulation. Much has happened since amalgamation, and the focus has largely shifted from rooming houses as long-term accommodation for lower-income tenants (including transitional housing for formerly homeless people) to rooming houses as shorter-term housing for students, especially in areas surrounding postsecondary campuses in the suburbs. Nevertheless, perennial issues remain: the decline of rooming house stock because of fires, redevelopment, and financial losses; the difficulties of maintaining (let alone improving) older housing in a sector with thin profit margins; the need to ensure safety in unregulated rooming houses; resistance to rooming houses in residential neighbourhoods on the part of some homeowners; and problems associated with housing very low-income tenants, some of whom may be dealing with mental health or substance abuse issues.

This report will review what has happened in the rooming house sector between the run-up to amalgamation and 2018 (for a history of rooming houses in Toronto before 1996, see Campsie 1994, 1995). In a second report, I will review rooming houses in other Canadian cities, including those that are part of the Neighbourhood Change Research Partnership.

2. How many rooming houses are in Toronto?

2.1 What are we counting?

Before trying to estimate numbers of rooming houses, it is important to define what is being counted. What is a rooming house?

First of all, “rooming houses are technically a living arrangement not a built form” (Freeman 2013: 3). They involve congregate living, in which people who are not related to each other occupy a building that has been subdivided so that tenants can rent individual rooms and share some facilities (a kitchen, a bathroom, or both, and sometimes other areas, such as a living room or dining room). In nearly all cases, the rooming house represents a conversion of an existing building (a house, commercial premises, an institutional site); purpose-built rooming houses do exist, but they are rare.

Since there are many other types of congregate living, municipal definitions often identify living arrangements that are *not* rooming houses. These usually include hospitals, group homes, tourist homes and hotels, nursing homes and retirement residences, and religious or student residences.¹

In Toronto, there is also a unique housing form known as a “bachelorette” – a very small self-contained unit in a converted house, found only in Ward 14 (Parkdale). These units are subject to licensing regulations in much the same way as rooming houses, and are usually included in any discussion of Toronto rooming houses.

A rooming house may be owned and operated by a private individual, a commercial corporation, a non-profit group, or a government entity. It may be owned by one entity and operated by another. In all cases, those who occupy the rooms are tenants who pay rent to the owner; their relationship to the owner is that of a tenant to a landlord, and subject to landlord and tenant law, even if the house is not licensed.² The house may offer accommodation only, or accom-

1 The question of licensing fraternities and sororities has sometimes been included in reports on licensing rooming houses. At present, they are not considered rooming houses and do not require licences (Toronto Municipal Code, 285-8C).

2 This is true with one exception: “tenant rights are covered by the RTA [*Residential Tenancies Act*] as long as the tenant and owner do not share a bathroom or kitchen” (East York East Toronto Family Resources Organization n.d.).

modation plus services such as meals, medical attention, or social services; rooming houses have long been used as the basis of supportive housing in Toronto (Suttor 2016b). The number of tenants can vary from a handful to more than a hundred. Each room may be occupied by a single individual (the most common situation), but in some instances, a room may be occupied by a couple, or by a parent and child, or by two unrelated roommates.

Finally, rooming houses are usually the cheapest housing option available in a town or city.³ A single room may rent for anywhere between \$400 and \$800 a month (Marshall 2015).

In various reports, including some of my own (Campsie 1994: 1), rooming houses are called “the bottom rung on the housing ladder” or “the lowest rung on the housing ladder” (see, for example, Mayor’s Homelessness Action Task Force 1999: 175). I am no longer comfortable with that description. For one thing, ladders are meant to be climbed, and some people may be unable to climb to a higher rung, or simply uninterested in changing rungs. For another, the metaphor suggests a stepwise movement from one rung to another, whereas people may move from one type of housing to another in ways that do not involve consecutive steps or “rungs.” Rooming houses are more accurately described as one option on a spectrum of housing options: sometimes a transitional form of housing for those who have spent some time without any housing at all, sometimes a short-term arrangement for immigrants or students who need cheap housing, and sometimes a long-term option for those with very low incomes.

2.2 Licensed rooming houses

The only rooming houses that can be reliably counted are those that hold licenses from a municipality. The previous history of rooming houses in Toronto included numbers for licensed rooming houses from 1986 to 1993, the only years for which records were available at the time (Campsie 1994: 34). Between those years, the stock declined by almost a quarter – from 603 in 1986 to 457 in 1993. The report also noted that the 1986 number was about half that of 1974, when rooming house licensing was introduced.

Today, the City of Toronto website provides a list of the addresses of licensed rooming houses in the former Cities of Toronto and York and “converted houses” (that is, bachelorettes in Parkdale/Ward 14). The list is updated periodically, and previous versions are removed from the website. When I first checked, in August 2016, there were 319 rooming houses and 48 converted houses (total 367). In October 2016, there were 316 rooming houses and 43 converted houses (total 359). As of January 1, 2018, there were 306 rooming houses and 51 licenses or applications for licensing for converted houses (total 357). Overall, the numbers continue to decline every year.

But that is not the only way to count rooming houses. The 2016 report of the rooming house review counted “regular” rooming houses (including some houses operated by non-profit groups that are not on the city’s list of licensed properties⁴), personal care homes (sometimes called

3 Rural rooming houses have existed in the past, and some may survive, but they would be very rare nowadays.

4 For example, the Homes First Society operates 16 houses that do not appear on the city’s list.

boarding homes and otherwise excluded from the report’s analysis), and Etobicoke “lodging houses” and came up with the total of 455 (City of Toronto 2016: 5).

Table 1: Excerpt from City of Toronto Rooming House Report, 2016

Table 2: Number of licensed multi-tenant houses in Toronto as of January 1, 2016

Regular	378
Personal Care	67
“Lodging Houses” in Etobicoke	10
Total	455

Toronto Community Housing also owns properties classified as rooming houses (see section 12). Some of these appear on the city’s list of licensed rooming houses, some do not.

The number of units in each building is not included in the city reports, so it is difficult to know how many people live in licensed houses, but it might be anywhere between 3,000 and 6,000 people.

2.3 Unlicensed rooming houses

Nobody knows how many unlicensed rooming houses exist in the amalgamated City of Toronto. Information about unlicensed rooming houses comes mainly from newspaper articles, either when a fire or a crime occurs in one, or a landlord is prosecuted in court, or a tenant or neighbour complains. The rooming houses that make it into the news this way may be in any part of the city. Tenants find accommodation in these houses through Kijiji or Craigslist or by word of mouth or from handbills posted on bulletin boards. These units exist in the underground or informal economy, unregulated and largely “invisible” to city authorities.

This “underground economy” is to some extent quite literally *underground*: many rooming-house-like arrangements are found in suburban basements.

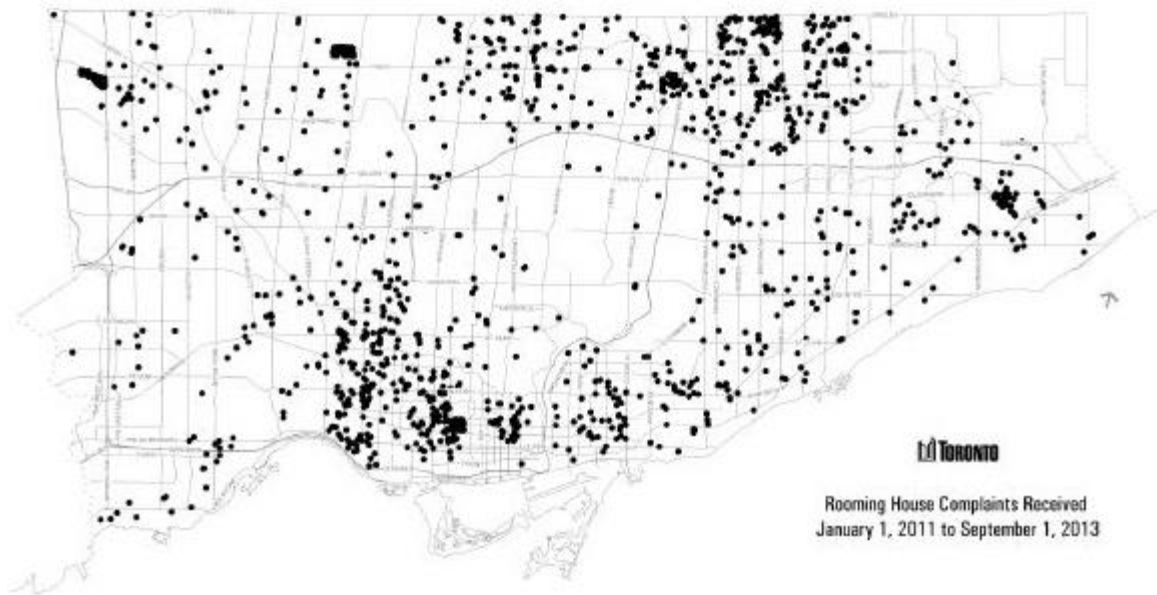
In the suburbs, rooming houses turn up in newer and older suburban homes, and usually appear in basements, which reveals how landlords push the boundaries of established bylaws that legalize basement apartments and second suites. Instead of renting their basement to one individual, many suburban landlords divide the basement into multiple rooms and operate the basement apartment as though it were a rooming house (Freeman 2013: 231).

The city cannot count these rooming houses, but it can keep track of complaints that *may* indicate a rooming house. One report (City of Toronto 2013: 21) mapped these complaints over a two-year period (see Figure 1). Even if some of these complaints turned out not to be rooming houses,⁵ it is reasonable to assume that there are many rooming houses in Scarborough, North

5 There are several legal ways in which unrelated persons may jointly occupy a house, which to outsiders may appear to be a rooming house. To be a rooming house, however, the premises must either be operated by the owner as a business or by a non-profit group as a service.

York, East York, and in parts of York⁶ and Etobicoke where they are not officially permitted under the zoning bylaws, in addition to unlicensed rooming houses in Toronto, where they are permitted by zoning bylaws, but require a permit in order to be counted.

Figure 1: Rooming House Complaints Received, 2011–2013



2.4 Etobicoke: A special case

City reports on rooming houses state repeatedly that rooming houses are permitted and licensed in both Toronto and Etobicoke, as if the two licensing regimes were similar. They are not. A paper for the Wellesley Institute (Freeman 2014: 6), notes:

Etobicoke's Lodging House Bylaw [Etobicoke Municipal Code Section 166, Bylaw 1978-41] is not comparable to Toronto's Rooming House Bylaw. It primarily licenses retirement-type homes and hostels, is limited in scope and licenses approximately seven houses in the Lakeshore area of South Etobicoke.

Even that does not fully describe the situation. Most residents of Etobicoke "lodging houses" live on the backstretch at Woodbine Racetrack. As a Toronto report from December 2009 (City of Toronto, City Planning 2009b: 8) notes:

6 In the former City of York, rooming houses were permitted in the zoning bylaw if they met certain conditions, but were not licensed. Rooming houses in Wards 11 and 17 are now licensed through the City of Toronto system. "Maximum occupancy in the City of York Zoning By-law is...controlled by minimum floor area per resident but also provides an absolute maximum occupancy of 10 residents. In York, rooming houses are referred to in the Zoning By-law as 'boarding or lodging houses.' Each resident in a lodging house must have a minimum of 41 square metres of floor area plus 7 square metres for each additional bedroom" (City of Toronto 2006: 4).

The nine [rooming house] licenses in former Etobicoke have a capacity of 348 residents. The two licenses at the Woodbine Race Track offer living accommodation for 310 of the total 348 licensed spaces available in all of former Etobicoke. Accommodation at Woodbine is for seasonal workers, such as horse groomers and walkers.

A report on the racetrack (City of Toronto City Manager 2015, Appendix H: 4) notes that about 80 workers live in these dormitories year-round, although the residences fill up in summer.

Originally built in the 1960s and 1980s, and expanded in 2006, the dorms have a total of 150 double occupancy rooms (300 beds)... Licensing responsibilities lie with Toronto Public Health, while investigations are completed at their request (typically annually) by Municipal Licensing and Standards.

That would leave fewer than 40 units in seven south Etobicoke lodging houses, although up-to-date numbers are hard to come by, because Etobicoke lodging houses do not appear on the online list published by the City of Toronto and are not included in the total. Presumably this is because Public Health, not Municipal Licensing and Standards, is responsible for licensing in Etobicoke.

Current Toronto zoning maps show a “rooming house overlay,” indicating where rooming houses are permitted. The current online map shows only a scattering of sites in Etobicoke, mostly along main roads (the areas outlined in magenta on the map in Figure 2).⁷ The Woodbine Racetrack area with its large rooming houses is not part of the overlay.

Interestingly, when this map is compared to a Google Earth view of Etobicoke, it is possible to see that many sites in which rooming houses are permitted are actually occupied by parking lots, gas stations, or high-rise apartments (see Figure 3 for one example). A planning official at the City of Toronto suggested that the sites identified in the overlay might once have contained rooming houses, but no longer did so, and that the map would likely be updated once citywide measures for rooming house were in place.

7 Retrieved January 20, 2017, from http://map.Toronto.ca/maps/map.jsp?app=ZBL_CONSULT

Figure 2: Etobicoke “Rooming House Overlay”

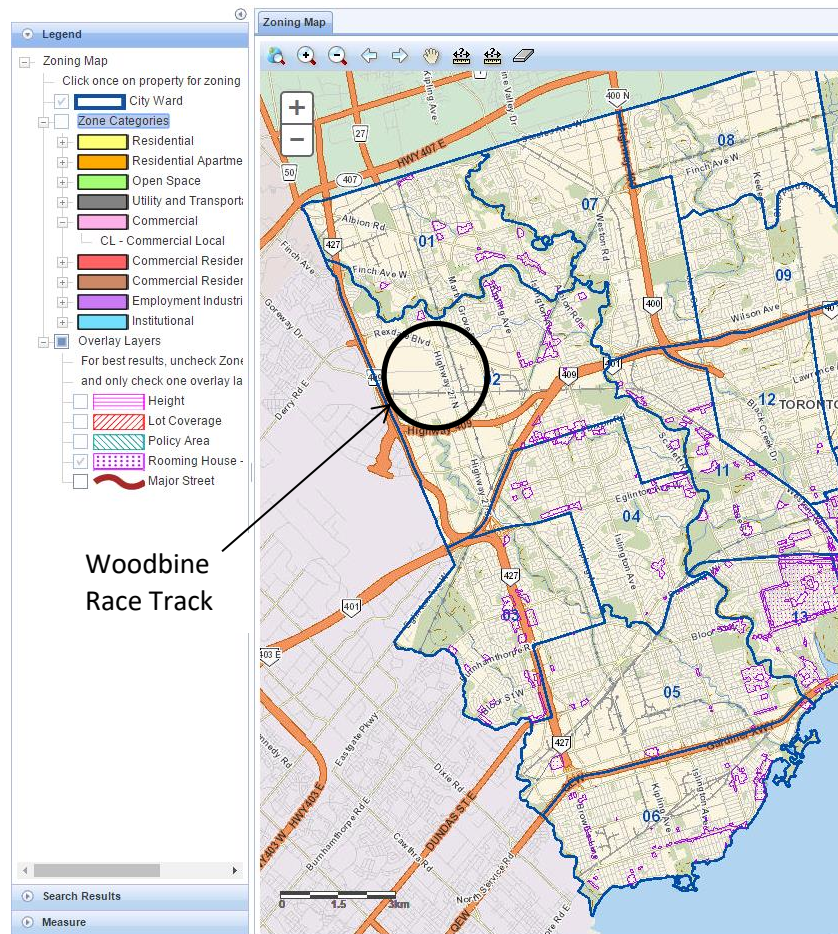
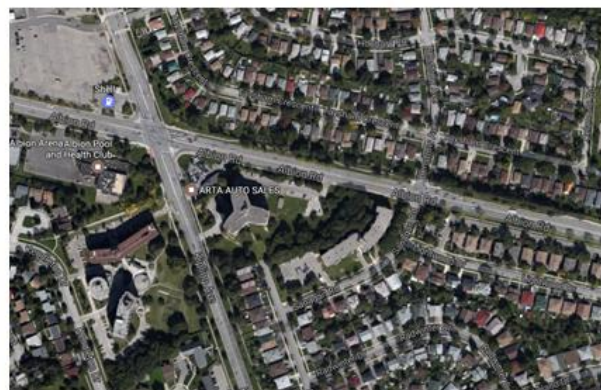


Figure 3: Rooming house overlay for the intersection of Kipling Avenue and Albion Road, Etobicoke

(Left: rooming house overlay in light pink; right Google Earth)



The 2009 report also listed the requirements for an Etobicoke lodging house, which differ from those for a Toronto rooming house.

In former Etobicoke, a rooming house is permitted in some residential and commercial zones in a detached residential building, provided it: occupies the whole of the building; is owner occupied; meets minimum lot frontage and lot area requirements; has a maximum of 10 residents; meets minimum floor area per resident requirements; has a minimum landscape area; meets a minimum separation distance of 300 metres between another rooming house, group home or a similar residential crisis care facility (City of Toronto, City Planning 2009b: 6).

These distinct requirements, as well as the apparently out-of-date rooming house overlay, have been maintained in zoning bylaws, throughout various attempts to harmonize the bylaws since amalgamation. Mariana Valverde (2012: 111) has called Etobicoke a “ghost jurisdiction” because the city no longer exists as a legal entity, yet its antiquated bylaws remain effective almost 20 years after its disappearance as a city.

2.5 A history of decline

The 2016 City of Toronto report states that the number of licensed rooming houses has been dropping since the 1970s and notes: “Some of the contributing factors to the decline include buildings being ‘de-converted’ from multiple-occupancy to single family dwellings or properties being redeveloped through the intensification of the property” (City of Toronto, Municipal Licensing and Standards and City Planning 2016: 5).

Behind that word “intensification” lies an interesting set of dynamics. Intensification is generally understood to mean increasing density on a site, and this is the definition used in the provincial *Growth Plan for the Greater Golden Horseshoe*.⁸ This is certainly the case when rooming houses are demolished to make way for high-rise condominiums.⁹

Yet some of the largest losses of rented rooms have occurred through the renovation of old hotels in downtown Toronto (the 2016 city report on rooming houses notes that large, single-room-occupancy buildings will be the subject of a further review, due later in 2017). The Drake, the Gladstone, and most recently, the Broadview, among others (see Chapter 7), have been transformed from residential hotels for low-income tenants to boutique hotels and event spaces. In this case, “intensification” does not mean increasing the residential density or the number of residential units within a defined area, but increased *investment* in a property, which often leads to reduced residential density or the conversion of former residential units to commercial space.

The report fails to mention rooming houses lost through fires. I was able to find newspaper articles on 18 fires involving eight deaths that occurred between 2007 and 2016. Table 2 is far

8 Under the Growth Plan for the Greater Golden Horseshoe (Ministry of Public Infrastructure Renewal 2006), intensification means: “The development of a property, site or area at a higher density than currently exists.”

9 For example, the proposed 32-storey condominium at Shuter and Mutual Streets entails the closure of 81 Shuter Street, a rooming house with 30 units (Novakovic 2016).

from exhaustive, but provides sufficient evidence that rooming house fires continue to be a problem.

Table 2: Toronto rooming house fires, 2007–2016

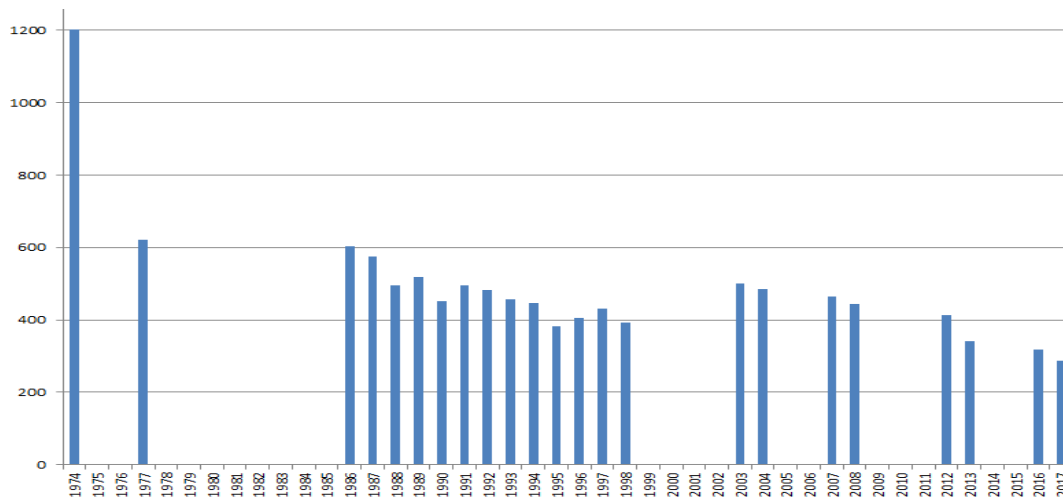
Year	Date	Location	Ward	Fatalities
2007	February 28	38 Prospect Street (nr. Gerrard & Parliament)	28	
2007	April 17	368 Spadina Ave at Baldwin (Chinatown)	20	
2010	March 29	22 nd Street (Etobicoke)	6	1
2011	March	73 Humber College Blvd. (Etobicoke)	1	1
2011	April 21-22	298 Queen Street West (above Black Bull Tavern)	20	
2013	October 8	244 Gladstone Avenue (nr. Dundas)	18	
2013	November 20	189 Sheridan Avenue (Brockton)	18	1
2014	February 14	235 Jarvis St. at Dundas	27	
2014	March 20	6 Andrews Avenue (near Kensington Market)	19	2
2014	December 22	290 Barton Street (Annex)	19	
2015	May 16	1569 Dupont Street at Perth (Junction)	18	1
2015	November 20	1265 College Street (near Lansdowne)	18	
2015	December 29	117 Birkdale Road (Scarborough)	37	1
2016	January 26	79 Wilson Park Road (Parkdale)	14	
2016	April 15	1285 Weston Road (Mount Dennis)	11	
2016	June 26	7 Lansdowne Avenue (Parkdale)	14	
2016	October 11	31 Alma Avenue (Little Portugal)	18	
2016	November 30	177 Elmhurst Avenue (Willowdale)	23	1

For the most part, these are older buildings in central Toronto. The causes of these fires range from arson to electrical fires to careless smoking by tenants. Not all of the articles identified a cause, and follow-up articles are rare. Of the properties listed above, only two remained on the January 2017 list of licensed rooming houses in the city. Several were not licensed at the time the fire occurred.

Despite the evidence of loss, rooming houses persist. I plotted the available numbers I found in reports and on city websites (see Figure 4). The number of licensed rooming houses has decreased by half in 30 years. At that rate, one might assume that the supply of licensed rooming houses in the old City of Toronto would drop to zero by 2046, but that will not happen. Rooming houses operated by non-profit organizations such as Housing First or Ecuhome will survive. Moreover, if the City of Toronto finds a way to regulate unlicensed rooming houses in parts of the city where they are currently unacknowledged, the total numbers for the amalgamated city will completely alter the picture.

At the same time, regulation can also lead to decline. In Figure 4, the dramatic drop in the mid 1970s was the result of the introduction of licensing. Rooming house owners who could not meet the licensing requirements either gave up the business or chose not to apply for a licence and continued to operate as an unlicensed (or “illegal”) house. This illustrates one further factor in the loss of the rooming houses: what has been described as the “regulatory ratchet” (Bardach and Kagan 1982). That is, regulation tends to move in one direction only – that of higher (and more expensive) standards. As more is required of operators (fire escapes, sprinkler systems, higher maintenance standards), more operators drop out of the system.

Figure 4: Rooming houses, former City of Toronto and City of York, various sources, 1974–2017



Parkdale, a neighbourhood with many rooming houses (see Chapter 6), has been particularly affected by the changes. The Parkdale Neighbourhood Land Trust sponsored a study published in May 2017, in which it noted that rooming houses were being lost to “speculation, up-scaling, and conversion”:

Our research found 198 rooming houses in Parkdale with an estimated 2,715 dwelling rooms — more than double the 1300 units owned by Toronto Community Housing within the study boundaries. We have also documented an escalating crisis of rooming house loss. The research confirmed that in the past 10 years, 28 rooming houses have been lost to conversion and upscaling gentrification, displacing an estimated 347 people. We believe 59 more, housing 818 people, are at imminent risk of being lost (Parkdale Neighbourhood Land Trust 2017: 6).

In the rest of this report, I will describe the key events and decisions over the past 20 years that have affected the rooming house sector, and led to the proposal now under consideration by City Council that, it is hoped, will ensure the survival of the remaining legal rooming houses and allow the City to regulate what are now “illegal” rooming houses.

3. Toronto just before amalgamation, 1997

Beginning in 1995, provincial cutbacks to welfare and housing programs made life much more difficult for low-income tenants. Some former rooming house residents became homeless when their welfare cheques could no longer cover their rent (Campsie 1996). Two years later, the Conservative provincial government introduced an act that further threatened the security of low-income tenants.

3.1 The Tenant Protection Act, 1997

Legislation governing landlord-tenant relations has swung back and forth over the years between favouring tenants and favouring landlords. It is indeed a tricky balancing act. In the 1990s, while researching the history of rooming houses since the 1970s, I heard just as many stories of landlords who had trouble evicting disruptive or delinquent tenants as I did stories of tenants being harassed by landlords or having to live in substandard conditions that landlords failed to address.

Since the provincial government that came to power in 1995 had decisively rejected public intervention in housing markets, it chose to favour private landlords, ostensibly on the grounds that they would provide the needed rental housing if given sufficient incentive to do so.

When Al Leach, Ontario Minister of Municipal Affairs and Housing, introduced the *Tenant Protection Act* in late 1996, he assured the Legislature that the Act represented “a crucial step in creating a climate where the private market will again invest in the rental real estate market” (Mahoney 2001: 261)

If that really was the government’s intention, then the egregiously misnamed *Tenant Protection Act* was a complete failure. It did not stimulate investment in new rental housing – condominium construction remained (and remains) more profitable. It simply gave the balance of power to landlords, making it easier for them to evict tenants, raise rents, demolish rental housing, or convert units from rental to other purposes.

The new act repealed and replaced the former *Landlord and Tenant Act*, the *Rent Control Act*, and the *Rental Housing Protection Act*. It allowed for “fast-track eviction,” facilitated by the following provision:

The time for filing a dispute shall be...(a) in the case of an application to terminate a tenancy or to evict a person, five days after the applicant has served the notice of hearing on the respondent (Province of Ontario 1997, clause 177).

In other words, when a tenant received an eviction notice, he or she had less than one week to respond in writing to dispute the notice. Tenants who did not dispute an eviction usually had 20 days in which to move out. If the tenant was accused of threatening the safety of the landlord or other tenants, the period was even shorter. More time was allowed if the eviction was to allow the landlord to make personal use of the rented unit.

In practice, many tenants did not receive or become aware of the notice, and tenants' failure to respond led to "default evictions," which took place without the tenants' having had an opportunity to challenge the eviction (Truemner 2006). The Centre for Equality Rights in Accommodation (CERA), in a pilot project, took on the role of ensuring that tenants received and paid attention to the notice, and provided information about their rights.

There were 5,852 applications to evict filed by landlords in the City of Toronto between September 9 and November 25, 1999. The Ontario Rental Housing Tribunal provided CERA with addresses for 4,309 of these tenants and each of these tenants was mailed an information package. This package contained a letter, a list of key telephone numbers and three pamphlets [on tenants' rights]... Attempts were [also] made to telephone approximately 1,200 tenants for whom telephone listings could be found... Tenants were sometimes in a state of shock when contacted, as they often had no idea that there were eviction proceedings against them (Centre for Equality Rights in Accommodation 2000: 6–7).

As part of the pilot project, CERA interviewed tenants involved in the eviction procedure and learned not only that "Almost one-third of tenants interviewed had not received a copy of the Application to Evict from their landlord," but also that "One-third of the tenants who *had* received a copy did not understand that they needed to respond to the application in writing within five days if they wanted a hearing." Furthermore, "of those tenants in arrears, 85.5% were two months or less in arrears" (CERA 2000: 7).¹⁰

If the eviction was disputed but upheld, the *Tenant Protection Act* gave tenants two days to move out; after this time, the landlord could dispose of the tenant's possessions:

Where an order is made to evict a tenant, the landlord shall not sell, retain or otherwise dispose of the tenant's property before 48 hours have elapsed after the enforcement of the eviction order (Province of Ontario 1997, clause 42).

The decision to evict was made by the newly formed Ontario Rental Housing Tribunal (ORHT). This was a special body set up to hear landlord-tenant disputes; its members were appointed by the government. "The Tribunal has exclusive jurisdiction to determine all applications under

10 The 12-week pilot project was effective, but could not be sustained after it was determined that sending personal information on threatened tenants to CERA was against privacy laws.

this Act and with respect to all matters in which jurisdiction is conferred on it by this Act” (Province of Ontario 1997, clause 157).

Not surprisingly, the number of evictions rose after the passage of the *Tenant Protection Act*. In 2001, Elinor Mahoney from Parkdale Community Legal Services wrote about the effects of the Act:

ORHT statistics for the year 2000 indicate there were 61,278 eviction applications filed province-wide in 2000, compared to 49,679 applications in 1997, the last calendar year that the courts handled landlord and tenant disputes. This is an increase of 24% in the annual rate since the *Tenant Protection Act* became law (Mahoney 2001: 274).

The ease of evictions was not the only reason for this increase. The *Tenant Protection Act* also gave landlords an incentive to evict, through the introduction of “vacancy decontrol” for rents.¹¹ That is, landlords could increase the rent when one tenant left and a new tenant signed a rental agreement. There were no limits on rent increases in this situation; rents were controlled only for sitting tenants.

The Act also made it easier to demolish rental units and redevelop a site: another incentive to remove sitting tenants. The *Rental Housing Protection Act* was repealed and not replaced. Demolition was allowed as a valid reason for eviction (clause 53).

Finally, the *Tenant Protection Act* gave landlords various grounds on which they could refuse to rent to lower-income tenants:

In selecting prospective tenants, landlords may use, in the manner prescribed in the regulations made under the *Human Rights Code*, income information, credit checks, credit references, rental history, guarantees, or other similar business practices as prescribed in the regulations made under the *Human Rights Code*, 1997, c. 24, s. 38 (Province of Ontario 1997, clause 38).

The *Ontario Human Rights Code* prohibits discrimination based on receipt of social assistance (or on other grounds related to gender, age, ethnicity, and so forth), but in many cases, landlords tended not to rent to tenants when their income information showed that they would be paying more than 30 percent of their income on housing. This practice was permitted under the *Tenant Protection Act*’s wording on “business practices.” However, a court decision from December 1998 ruled that this approach was unlawful.

An Ontario [Human Rights] board of inquiry handed down a ruling yesterday that forbids landlords to refuse an apartment to a poor person based on the prospective tenant’s low income. In a decision that housing advocates hailed as a victory for the nearly 2,000 families stuck in Toronto shelters, the special three-member board ruled there was “simply no evidence” that tenants whose rents would exceed 30 per cent of their incomes are at a higher risk of defaulting on their monthly cheques than more affluent renters (Philp 1998).

11 This provision is found in Clause 124, which contains what sounds like circular wording: “The lawful rent for the first rental period for a new tenant under a new tenancy agreement is the rent first charged to the tenant.”

The suit had been launched four years earlier, under the previous legislation, on behalf of families who had been refused rental housing by landlords, and had ended up in emergency shelters as a result.

To this day, the website of the Ontario Human Rights Commission¹² continues to warn landlords not to apply “income ratios” when they consider prospective tenants.

The *Tenant Protection Act* remained in force for 10 years, and was replaced by the *Residential Tenancies Act*, 2006, which came into force in January 2007. The Ontario Rental Housing Tribunal was replaced by the Landlord and Tenant Board. The eviction process was altered, allowing tenants more opportunities to respond and forbidding “default evictions.” Information was provided directly by the Board to the tenant rather than leaving communications in the hands of the landlord. The actual eviction, if upheld, was carried out by a provincially appointed sheriff, not the landlord.

However, the new act continued to allow fast-track evictions (under slightly different conditions) and vacancy decontrol. Rent increases were permitted every year and tied to the Consumer Price Index; for buildings built after 1991, the amount by which a landlord could increase the rent was not restricted. A *Residential Tenancies Amendment Act* in 2012 put a 2.5 percent limit on rent increases for sitting tenants in older buildings, but the exemption for newer buildings was maintained.

In May 2017, the Ontario government enacted legislation called the *Rental Fairness Act*. The act eliminated certain exemptions to rent increase rules and required landlords to compensate tenants if they terminate a tenancy in order to convert a unit to personal use. Vacancy decontrol, however, was left unchanged.

3.2 Homelessness in the headlines

In the year before amalgamation took effect, as the City of Toronto grappled with the fallout from the provincial and federal cutbacks, attention focused on the worsening and increasingly visible problem of homelessness.

In 1996, Metro Toronto had formed an Advisory Committee on Homeless and Socially Isolated Persons. “The original intent of the committee was to focus on daytime services for homeless and socially isolated persons. However, after the freezing death of Eugene Upper, a homeless man, on January 6, 1996, the mandate and membership was broadened to include prevention and long-term issues” (City of Toronto City Clerk, 2002). This committee operated at the metropolitan scale, since its members acknowledged that homelessness affected all parts of the city.

Nevertheless, on September 30, 1997, as Mel Lastman campaigned to be the first mayor of the amalgamated City of Toronto, he announced that there were no homeless people in the City of North York, where he had been the mayor for 24 years. That same night, a homeless woman was found dead in a North York gas station washroom (DeMara and Lakey, 1997); she was later identified as Linda Houston. The unfortunate coincidence did no permanent damage to Mr. Last-

12 See <http://www.ohrc.on.ca/en/learning/human-rights-and-rental-housing/landlords-and-rental-housing>

man's political career, and he went on to be elected mayor. He did, however, immediately establish the Mayor's Action Task Force on Homelessness, chaired by Anne Golden, then president of the United Way of Greater Toronto, which began its work in January 1998.

4. Amalgamation year, 1998

4.1 The Disaster Declaration

Amalgamation took effect on January 1, 1998, with Mel Lastman as mayor of the new City of Toronto. In the spring of that same year,

A unique collection of individuals came together ... to address the growing problem of homelessness in Toronto and Canada. The group included a lawyer, a priest, a retired Member of Parliament, a retired teacher, a street nurse, a community organizer, a formerly homeless man, a university professor of social work, a housing advocate, a real estate investor and a Bay Street investment manager (Toronto Disaster Relief Committee 2012).

This group became the core of the Toronto Disaster Relief Committee (TDRC). A key insight from this group was that homelessness represented a manmade “disaster” on the scale of a natural disaster, particularly one that was still on people’s minds at the time: the ice storm that had devastated eastern Ontario and parts of Quebec in January 1998. A government declaration of a “disaster” normally leads to an immediate humanitarian response and unlocks special resources to help those affected. In this spirit, the TDRC issued the following declaration:

We call on all levels of government to declare homelessness a national disaster requiring emergency humanitarian relief. We urge that they immediately develop and implement a National Homelessness Relief and Prevention Strategy using disaster relief funds both to provide the homeless with immediate health protection and housing and to prevent further homelessness. Canada has signed the International Covenant on Economic, Social and Cultural Rights guaranteeing everyone’s right to “an adequate standard of living ... including adequate food, clothing and housing.” Homeless people have no decent standard of living; our governments are violating these Human Rights. Despite Canada’s reputation for providing relief to people made temporarily homeless by natural disasters, our governments are unwilling to help the scores of thousands of people in Canada condemned to homelessness. Morally, economically, socially, and legally, we cannot allow homelessness to become “normal” in Canadian life. Inaction betrays many thousands of us to a miserable existence and harms our society for years to come (Toronto Disaster Relief Committee n.d.).

The group also noted that in the mid-1990s, all levels of government had spent 1% of funding on housing, but by 1998, cutbacks had eroded that level of support. The group recommended restoring funding to its previous level, and increasing it by a further 1%, and called its recommendation “The One Percent Solution.”¹³ TDRC’s proposal included support for low-income tenants through government rent supplements, the rehabilitation of substandard rental stock, and the creation of new affordable rental units.

The Disaster Declaration drew public attention to the scale of the problem, and led to some important changes, but government funding for affordable housing was never forthcoming on the scale requested or needed.

4.2 Tent City

The year 1998 also saw the beginnings of Tent City, an encampment near the waterfront on a vacant, formerly industrial site owned by Home Depot, which had intended to build a big box store there but could not get the necessary planning permission to proceed. The people who moved to the site included many “rough sleepers” – the term for people who live mostly outdoors.

Although the city has an extensive shelter system, an increasing number of people do not use any of the available shelter services. Some find it difficult to adapt to hostel conditions or cope with the basic rules associated with shelter life, often because of mental health or addiction issues. Instead, these people survive outdoors, living in ravines, open spaces, under bridges or in squats.

Tent City was Toronto’s first major squatter settlement in recent history. It was formed in 1998 when a group of homeless individuals built shacks and lean-tos on a property on the waterfront owned by Home Depot. The settlement grew slowly as other homeless people heard about the small community (Gallant, Brown and Tremblay 2004: 2).

TDRC members worked with the residents, not only to provide support, but also to draw attention to their plight and that of other homeless city dwellers. As well, “various social service agencies including Street Health, Regent Park Health Centre, Street Patrol and Street Outreach Services offered health care and food” (Gallant, Brown and Tremblay 2004: 2). Meanwhile, newcomers swelled the population of Tent City to more than 100 squatters, and the encampment remained for four years; the residents were evicted in September 2002.

City staff helped most of the evicted squatters find more permanent housing (in many cases in rooming houses), with rent supplements and extra support. The success of this emergency response helped contribute to the City’s Streets to Home program a few years later (Falvo 2009: 19). However, all such programs depend on a supply of affordable rental units; the loss of rooming house units means fewer options when housing workers need to find accommodation for homeless people.

13 “Governments should implement a ‘1 per cent solution’: All levels of government now spend an average 1 per cent of their total budgets on housing. Adding another 1 per cent, and henceforth devoting the total 2 per cent to long-term housing, would take the single largest step towards eliminating homelessness” (Toronto Disaster Relief Committee n.d.).

4.3 The health of rooming house residents

During 1998, a research team led by Stephen Hwang, Rochelle Martin, J. David Hulchanski, and George Tolomiczenko of St. Michael's Hospital and the University of Toronto interviewed 295 residents of 171 licensed rooming houses in Toronto about their lives and their health. The results were later published in the *Canadian Journal of Public Health* (Hwang et al. 2003). The research provides a snapshot of who was living in rooming houses during amalgamation year.

As a summary table in the paper shows (see Table 3), rooming house residents were a very diverse group, and many common assumptions about their background, lifestyles, and social status did not apply to the whole group. They were not all single, not all unemployed, not all undereducated. Many did not smoke, drink, or use drugs. What they had in common was low incomes and a need for affordable housing.

The study also found that on average, rooming house residents had poorer health than people in the general population; the researchers made a direct link between the physical conditions of the rooming house and the residents' health. Rooming houses in poor physical condition usually had residents with poor health. The report suggested that "seeking out the most obviously dilapidated rooming houses will effectively identify those individuals with the greatest health needs" (Hwang et al. 2003: 439).

These statistics aggregate the many individual stories that the researchers must have heard while conducting this research. Those who work with roomers, such as street nurse Cathy Crowe, have told many stories over the years of the individuals living in rooming houses, and how they came to be there. I have heard many myself, and read accounts written by others. I realize that in the interests of covering the overall story of rooming houses, I am omitting the individual stories of roomers. I will include just one here. It is no more "typical" than any other, but it suggests that some people become roomers because of poor health, rather than having health problems because they are roomers.

I met "Tiny" (so-called because he weighed 300 pounds) in a rooming house on Jarvis Street in the late 1990s. "Tiny" had once worked on oil rigs and owned a house in Calgary. He had never married, in part because his schedule called for weeks of work at a time on the rig. In the 1980s, "Tiny" had injured his back so badly that he could no longer work. Shortly thereafter, he lost his savings because of the bankruptcy of the Principal Group in Alberta in 1987. In pain, out of work, and with no money, he began drinking heavily and became homeless. Since he was no longer engaged in physical work, he gained weight. At some point he moved to Toronto. When I met him, he was trying to stay sober. He attended appointments at the Wellesley Hospital nearby (the hospital closed in 2003) and the housing worker who introduced us felt that he had a chance to turn his life around. I do not know what happened to him, but I was struck by the way multiple losses – health, money, home – had contributed to the situation in which he found himself. His story is neither typical nor atypical. It is just one of many stories from roomers of all kinds who need inexpensive housing, close to services they depend on.

Table 3: Characteristics of Rooming House Residents, 1998

TABLE 1				
Characteristics of Rooming House Residents, Overall and by Gender				
Characteristic	Overall n=295	Men n=249	Women n=46	p-value
Age, mean (years)	40.6	41.3	37.2	0.071
Ethnic group				
White	82.3	83.5	73.9	0.104*
Non-white	17.7	16.5	26.1	
Black	8.5	7.2	15.2	
Aboriginal	2.4	2.0	4.3	
Asian	3.4	2.8	6.5	
Other	3.4	4.0	0	
Marriage status				
Single, never married	63.7	64.0	62.2	0.038
Divorced/separated	27.7	29.1	20.0	
Married/common-law	6.5	5.7	11.1	
Other	2.1	1.2	6.7	
Education level				
Grade school	11.9	12.4	8.7	0.017
Some high school	34.6	34.5	34.8	
High school graduate	18.6	21.3	4.3	
Some university	20.0	18.9	26.1	
University graduate	14.9	12.9	26.1	
Employment status				
Unemployed	66.0	69.4	47.8	0.005
Employed	34.0	30.6	52.2	
Monthly income, mean (\$)	962	950	1037	0.529
Ever homeless in lifetime				
Yes	35.6	36.1	32.6	0.645
No	64.4	63.9	67.4	
Homeless in past 5 years				
Yes	23.1	24.5	15.2	0.120
No	76.9	75.5	84.8	
Smoking status				
Daily smoker	56.6	58.6	45.7	0.187
Occasional smoker	5.4	5.6	4.3	
Non-smoker	38.0	35.7	50.0	
Alcohol consumption past year				
None	33.6	32.1	41.3	0.603
≤ Once a month	7.1	6.8	8.7	
Once a month	6.4	5.2	13.0	
2-3 times a month	10.2	9.6	13.0	
Once a week	11.2	12.4	4.3	
2-3 times a week	16.9	16.9	17.4	
4-6 times a week	4.7	5.6	0	
Every day	9.8	11.2	2.2	
Ever had drinking problem				
Yes	31.7	33.9	20.0	0.066
No	68.3	66.1	80.0	
Substance use in past year				
None	68.9	68.4	71.7	0.419
One substance	17.1	18.2	10.9	
≥ Two substances	14.0	13.4	17.4	

* Comparison of ethnic groups was based on the categories of white and non-white. Figures shown are percentages, unless otherwise indicated. P-value is shown for the comparison between men and women. Gender comparisons were made using independent sample t-tests for continuous variables and Pearson chi-square for categorical variables.

5. The Mayor's Task Force report on Homelessness, 1999

In January 1999, after a year of study, the Mayor's Action Task Force on Homelessness produced its 291-page final report, *Taking Responsibility for Homelessness*. The report identified five "high-risk sub-groups": families with children, youth, abused women, Aboriginal people, and immigrants/refugees. Other than families, these groups overlap with the rooming house population, although rooming houses also accommodate low-income adults and seniors who are not immigrant, nor Aboriginal, nor victims of abuse.

5.1 Rooming house–related recommendations

The Task Force report included prevention strategies and health strategies, as well as proposals for maintaining and expanding supportive housing and affordable housing. Its 105 wide-ranging recommendations included five that specifically mentioned rooming houses.

Recommendation 67. The Province should continue to expand the Habitat program for boarding houses and extend the program to other types of accommodation such as rooming houses.

Update: The Habitat program that supports consumer-survivors of the psychiatric system who live on social assistance was established in 1987 and today monitors residents in 45 boarding homes and 15 apartment units. In November 1998, as the Task Force was finishing its work, the Province, at the City's request, expanded the Habitat Program by 100 beds. Another 100 beds were added in 2000. However, "Adding beds to the Habitat Services program does not increase the amount of overall housing stock. It does, however, improve the conditions in existing low-cost rental stock" (City of Toronto 2000: 24–25).

Recommendation 95. Federal Residential Rehabilitation Assistance Program (RRAP) funding for the City of Toronto should be expanded to \$7 million a year to include rental apartment buildings, rooming houses, and second suites.

Update: The RRAP program, created in the 1970s, offered subsidies "to low-income homeowners, and to landlords providing rental housing for low-income residents or persons with disabilities if the housing requires major repairs in at least one of the following

categories: heating, structural components, electrical systems, plumbing or fire safety” (Canada Mortgage and Housing Corporation 2009: 23). Funding did increase to more than \$7 million in 1998–99, but fell to about \$5 million in 1999–2000. The program continued to fund rooming house repairs for more than a decade. It ended on March 31, 2012, and the federal government transferred responsibility for residential rehabilitation to the provinces. The replacement program, Toronto Renovates, announced in 2015, offered 15-year forgivable loans of up to “\$24,000 for each rooming house bed unit or self-contained unit, for essential health and safety repairs, renovations, and accessibility modifications” (City of Toronto Affordable Housing Office 2015: 5). That year, the program funded repairs to 24 rooming houses in the former City of Toronto and two lodging houses in Etobicoke.

Recommendation 103. Council should permit rooming houses as-of-right in commercial zones and multiple-unit residential zones on arterial roads throughout the City. Existing rooming houses that comply with health and safety standards should be legalized.

Update: In 2009, the updated zoning bylaw proposed allowing rooming houses in commercial and multiple-unit zones in parts of the city where rooming houses had not been permitted, but that zoning bylaw was repealed in 2010; a further attempt in 2013 to permit rooming houses in these zones is not yet in force. Current proposals do not restrict rooming houses to arterial roads or commercial zones, but would allow them in residential zones (where most of them now exist anyway). As of 2017, these proposals are still under consideration but have not been implemented (see Chapter 14).

Recommendation 104. CMHC should assist rooming house owners to access mortgage financing.

Update: In 2004, a report for the city noted: “Recently, the Rooming House Working Group has succeeded in obtaining a commitment from CMHC and major lenders to give greater consideration to applications for mortgage insurance on licensed rooming houses” (SHS Inc. and Richard Drdla Associates 2004a: 14). However, beyond this “consideration,” it is not clear that CMHC has increased support for rooming house operators.

Recommendation 105. The City should explore ways to reduce or mitigate the impact of the new property tax burden on rooming houses.

Update: Ontario Regulation 282/98 was amended in September 2003 to include municipally licensed rooming houses in the residential property tax class.¹⁴ The 2000 Report Card on Homelessness (City of Toronto 2000: 24) also noted that “new multi-residential rental housing will now be taxed at the same rate as residential housing. Provincial law limits this new tax class to eight years, but the City is working have it made permanent.” The 2003 Report Card noted: “In 2002, City Council extended a special property tax reduction program for new rental housing from the original eight years to a 35-year period” (City of Toronto 2003b: 48). The City has also provided some tax relief to rooming

14 The amendment can be found at <https://www.ontario.ca/laws/regulation/r03362> and the current version of the regulation at <https://www.ontario.ca/laws/regulation/980282#BK5>

house owners in Parkdale as part of a specially negotiated arrangement (see Chapter 6 below).

Many other recommendations in the report applied to low-income tenants. These included a rent bank to help renters avoid arrears, help for renters on social assistance (who often experienced discrimination in the rental market), and measures to preserve rental housing stock.

Recommendation 40. The City of Toronto should fund and administer a City-wide rent bank with a \$500,000.00 annual budget, to help individuals and families deal with short-term rent arrears. Access to the rent bank should be through designated multi-service agencies.

Update: A one-year Rent Bank Pilot Project had already been launched in 1998 with \$40,000 in funding from the City and other agencies. However, it was available only to families with children, and not to single individuals. In 1999, the program was continued and the funding was increased to \$200,000 (City of Toronto 2000: 28–29). Toronto still has a rent bank that is administered by several non-profit agencies; funding is now available to individuals as well as families (City of Toronto, Shelter Support and Housing Administration n.d.).

Recommendation 45. To ensure that social assistance recipients can rent affordable apartments, rapid payment of first and last months' rent should be provided by the City when requested, and Proof of Address procedures should be expedited.

Update: Through the Toronto Rent Bank, "Limited funding for Emergency Rental Deposit Loans is available for low-income households requiring first and last months' rent to move into more affordable/stable housing" (City of Toronto, Shelter Support and Housing Administration n.d.).

Recommendation 97. The Province should grant appropriate authority to the City of Toronto to control demolition of affordable rental properties.

Update: The City of Toronto enacted by-law 147-1999 in April 1999 to set conditions for granting permission to developers to demolish rental units or convert them to owner-occupied units. The development industry appealed to the Ontario Municipal Board, and in September 1999, the OMB declared the by-law invalid (City of Toronto 2000: 21). In October 2000, City Council asked the province to approve special legislation on the demolition of rental housing in the city (City of Toronto 2001: 20). The private bill – Pr22, City of Toronto Act (Rental Housing Units), 2001 – did not proceed to second and third reading in the Ontario legislature (Advocacy Centre for Tenants Ontario 2011).

In 2006, the Province passed the *City of Toronto Act*, giving the City "broad powers to pass by-laws on matters ranging from health and safety to the city's economic, social and environmental well-being, subject to certain limitations" (Ontario Ministry of Municipal Affairs 2015). Under this act, the City passed by-law 885-2007 (now Municipal Code Chapter 667) in July 2007, giving the City authority "to prohibit and regulate the demolition of rental housing properties and the conversion of rental housing to a purpose other than residential rental purposes" (City of Toronto, City Planning 2007: 2).

This was an important step, but it did not apply to rooming houses.¹⁵ Demolition control applies only to self-contained rental apartments, not to individual rooms. Rooming houses continue to be demolished in the City of Toronto.

One other set of recommendations that may not at first seem to be related to rooming houses, but that came to be significant later was the recommendation (no. 102) related to “second suites.” The task force recommended that existing second suites that met health and safety standards be legalized. Six months later, in July 1999, the amalgamated City of Toronto passed bylaws 446-1999 and 447-1999 to permit second suites as of right in all single detached and semi-detached houses throughout the city.¹⁶ The bylaw was appealed by several residents’ groups, but upheld by the Ontario Municipal Board in 2000.

5.2 The Report Cards, 2000, 2001, 2003

The report of the Mayor’s Task Force on Homelessness called for an annual report card on homelessness, to be produced by a “facilitator” whose job was to oversee the implementation of the report recommendations. The City did not appoint a facilitator, but in 2000, it did produce a Report Card on Homelessness. Another one appeared in 2001. The schedule was then changed to every two years, and a report appeared in 2003, this one called the *Report Card on Housing and Homelessness* (not just homelessness). It was, however, to be the last one, although other cities (such as Ottawa and Waterloo) began producing report cards, and a Canadian Report Card on Homelessness appeared in 2013 (Gaetz et al., 2013).

The Toronto report cards contain a wealth of information on trends in poverty, shelter use, social housing waiting lists, evictions, rental housing demolitions, and the efforts by the non-profit sector to create new housing. Actions (or the lack of action) by the federal, provincial, and municipal levels of government are noted, along with financial commitments.

According to a City staff member who helped prepared the report cards, they were widely circulated and well received, and proved useful among community groups in program development and in preparing proposals for funding. They also represented a mechanism to ensure accountability at all levels of government.

Why did the report cards stop in 2003? No-one is quite sure, but there were staffing changes as some senior advisers moved on to other positions, and possibly also changes in the City’s priorities. The work of compiling the report cards was certainly labour- and resource-intensive, as the long list of contributors in each report card shows. The City may have decided to focus these resources elsewhere.¹⁷

15 “Under the definitions in the by-law, rental units are self-contained units with kitchen and bathroom facilities, and do not include rooms such as those in rooming houses” (City of Toronto, City Planning 2007: 5).

16 The only qualifications were that the second suite could not be larger than the main part of the house (that is, the conversion should not create a duplex) and that the house had to be at least five years old. The bylaw amended the existing official plans and zoning bylaws of all the former cities within Toronto as well as of Metropolitan Toronto. There were slight differences in the wording and requirements for the former cities.

17 The City did, however, conduct three homelessness counts (also known as Street Needs Assessments) in 2006, 2009, and 2013 (City of Toronto 2013).

Other changes were also under way at the City. Although the mandate of the Advisory Group for Homeless and Socially Isolated Persons had been renewed for an indefinite period in 2002 (City of Toronto City Clerk, 2002), in January 2007, Mayor David Miller ended the work of nearly all advisory bodies and working committees with a view to reassessing their mandates and the need for their work (City of Toronto Mayor's Report 2007). The Advisory Group had acted as a forum at which community leaders and groups could bring forward proposals for and even opposition to City initiatives, in a group chaired by two city councillors. The discussions were often open-ended, but the Group gave residents, including some rooming house residents, a voice and an opportunity to put forward proposals that councillors could consider.¹⁸

Toronto maintains a long-standing "Rooming House Working Group," made up of residents, tenants, housing workers, and city staff, but it is no longer very active. All four meetings planned for 2016 were cancelled because of a shortage of attendees, even though a new approach to rooming house licensing and zoning was being crafted that year.

18 The list of 18 participants at the time of renewal included two city councillors, representatives from the Children's Aid Society, the John Howard Society, and the Salvation Army, and several community organizations, as well as five people listed simply as "individuals" – mainly people with firsthand experience of homelessness and social isolation.

6. Rooming houses in Parkdale, 1999–2017

The Parkdale neighbourhood to the west of Toronto's downtown has a high concentration not only of rooming houses but also of small, self-contained units in converted houses known as “bachelorettes.” Bachelorettes are, if not unique to this part of the city, a housing form that has been subject to intense scrutiny and many regulation attempts over the years, as described in the previous history of rooming houses (Campsie 1994). Since amalgamation, the area has been the site of efforts to “regularize” bachelorettes and is currently the subject of proposals for a community land trust to preserve its remaining rooming house stock.

Figure 5: Parkdale location map



Source: Goodmurphy and Kamizaki 2011

6.1 Confrontation and mediation

“South Parkdale is a unique, beautiful, and troubled neighbourhood, currently riven with conflict between incoming gentrifiers and artists, and a long-standing population of poor and marginalized residents” (Slater 2005). In the autumn after amalgamation, that conflict had boiled over in a hostile confrontation at a community meeting in Parkdale. As Miriam Barna (2007) describes the situation:

On October 7, 1998, [Toronto] Urban Planning and Development Services held a public meeting to discuss a proposal intended to resolve the long-standing issue of Parkdale's illegal bachelorettes. The City was proposing an entirely new zoning system, restricting all new multi-unit residential buildings in hopes of “rebalancing” the neighbourhood in favour of

families. This controversial proposal exposed two decades of tension, anger, and mistrust between the neighbourhood's numerous stakeholder groups. The meeting degenerated into an explosive battle between antipoverty activists and homeowners, all fearful of losing the community that they saw as their own. Productive discussion became unfeasible as the meeting turned into a battleground of shouting, cursing, and potential violence and was quickly shut down (Barna 2007: 4).

The document that had started the controversy was called *Ward 2 Neighbourhood Revitalization: Draft for Discussion* (before amalgamation, Parkdale was in Ward 2). The report noted that “an interim control bylaw has been put in place for South Parkdale to prevent new bachelorettes and apartments from being created while the City is putting together new neighbourhood strategies” (City of Toronto Urban Development Services 1997: 2). It proposed “an entirely new zoning...that would (in the low-density residential zoning districts) limit the number of units permitted in new developments to one or two per lot and *clearly establish that additional apartments and small units would be prohibited*” (City of Toronto Urban Development Services 1997: 1; italics in original).

The tensions over bachelorettes in Parkdale dated back to the 1970s, and had previously led to high-profile and expensive legal interventions in the early 1980s (Campsie 1994). A Toronto City Council report from 1999 summarized the issues:

a) In the late 1970's and early 1980's many of the large houses in South Parkdale that had been converted to rooming houses were renovated to add culinary/kitchen facilities to the rooms to create self-contained units. Most of these units were, prior to the addition of culinary facilities, in conformity with approved standards and Building Permit plans for rooming house units. The conversion to small, self-contained units was frequently completed without a Building Permit and, in many cases, the resulting buildings were unable to meet the Zoning By-law requirements for such things as minimum unit size, parking and open space, and in some cases, Building Code requirements. The legal status of these buildings has yet to be resolved and was a major part of the negotiation process.

b) The construction of new rooming houses was prohibited in South Parkdale in 1978. However, many single-family buildings were subsequently converted to either rooming house or bachelorette units. A small proportion of these rooming houses, which may have been created after 1978, were licensed by the Rooming House Licensing Tribunal due to uncertainty about the date of their conversion. The Tribunal took considerable latitude for interpretation. Construction had often been done without a Building Permit, and the lack of permit and proper inspection raised concerns that many of these units did not meet current Building Code, Health or Fire standards. Although similar to converted rooming house units in some respects, these units have no basis for claiming to be an approved rooming house prior to conversion to self-contained units (City of Toronto, Toronto Community Council 1999).

The 1998 confrontation was just the latest in a series of arguments over how to “regularize” these units. Unlike previous confrontations, however, it led to a year-long conflict resolution process (described in detail in Barna 2007) that culminated in the Parkdale Pilot Project, launched in 1999.

6.2 The Parkdale Pilot Project

The Parkdale Pilot Project helped landlords legalize and license their buildings while improving tenant safety. For each participating property, a site-specific bylaw provided stability for both the landlords and the tenants, and an incentive for landlords to participate, in that they would be subject to a lower tax rate on their properties.¹⁹

The process was quite detailed. The landlord would submit an application with eight sets of architectural drawings; these would be checked by a Team Inspector and an Examiner for accuracy and compliance with building code and other requirements, as well as by the Fire Department. The Director of the Parkdale Pilot Project, the Fire and Housing Inspectors, the Plans Examiner and the owner of the property would meet to discuss the building, after which the Examiner would prepare recommendations for the Parkdale Housing Committee, which would meet to discuss the property; then a public meeting would be held to obtain community input. Finally, a statutory meeting would be held by the Community Council at which the report and draft by-laws were presented; Community Council's recommendations were forwarded to City Council and if approved, the bylaws were passed (Simon 2009: 15).

The City expected the project would take about two years, regularize 200 buildings, and cost about \$410,000 a year. In fact, it took 10 years (and a total budget that was never tallied) and involved about 80 buildings. An evaluation of the project by (Simon 2009: 20) breaks down the numbers:

While the Parkdale Pilot Project initially identified 200 properties containing bachelorettes, only about 110 properties were eligible for the program. The other buildings were already licensed, contained units that were too large, or had fewer than four units. Of the eligible 110 properties, 80 agreed to apply to the Parkdale Pilot Project. Sixty-six have already completed the process and 14 are expected to finish by the spring of 2009.

In the evaluation, Simon identifies lack of financial support from the City, staff turnover, and poor record-keeping among the project's difficulties:

The original budget of \$410,000 for the first two years was halved before the Parkdale Pilot Project even began. Staff salaries were paid for by their seconded departments and no extra money was given for advertisements or meeting space...

The Ward Councillor changed three times throughout the Parkdale Pilot Project and the records that each councillor gathered throughout his or her term were considered private and therefore were not passed on to the next councillor... In addition, there was so much staff turnover at City Hall due to amalgamation that records were not kept in one place.

Many reports were lost and the City, on occasion, asked the Parkdale Housing Committee, a well-organized volunteer group, for copies of certain City documents (Simon 2009: 23).

Between about 2004 and 2006, the project was largely dormant. In 2006, the election of a new councillor in Ward 14, Gord Perks, injected some life back into the initiative, but there was no new money and little staff support. Nonetheless, the project did achieve the goal of maintaining affordable rental housing in Parkdale and keeping tenants housed.

19 Landlords were expected to pass the tax savings on to tenants, but there was no follow-up to ensure that they did so.

In an interview with the *Parkdale Villager* in 2015, Councillor Perks said, “City staff are looking to include lessons learned from Parkdale as we discuss all the illegal rooming houses in parts of the city” (Caton 2015). But scaling up this site-by-site approach to a citywide program would not be easy. Moreover, some landlords persistently failed to participate. There was no penalty for non-participation, and few incentives to take part in a time-consuming and onerous process. If the City is considering extending this model elsewhere, it may need to find ways to encourage, if not compel, landlords to participate.

Simon (2009: 25) summed up the results in a table:

Table 4: Summary evaluation of the Parkdale Pilot Project

Components	Evaluation
Site-specific by-laws	Succeeded at developing site-specific by-laws for each participating property
Licensing	Succeeded at licensing the majority of properties that have participated in the project although there are still several landlords that need to apply for a license
Taxation	Failed to monitor rental reductions due to a reduction in property taxes
Enforcement	Failed to enforce any noncompliant landlords or develop an enforcement strategy
De-housing	Succeeded at limiting the impact of tenant disruption and resettlement even though the project failed to develop a tenant relocation strategy
Affordability	Succeeded in maintaining affordable rents in bachelorette apartments in Parkdale

There certainly are lessons to be learned from the Parkdale Pilot Project. One of them is that any attempt to replicate it on a larger scale will require dedicated staff and resources and will take many years to complete.

6.3 The Parkdale heat registry, 2008–2009

In 2005, a Parkdale resident called Richard Howell died in his rooming house during a heat wave. He lived on the third floor; the windows of his room could not be opened more than a few inches and there was no air-conditioning (Gandhi 2005). The Toronto Disaster Relief Committee called a press conference on July 5, 2005, to call attention to the problem of extreme hot weather for vulnerable tenants, recommending that the City

Legislate a maximum temperature in the city’s Municipal Code as a parallel provision to the current requirement that landlords provide minimum temperature from September 15 to June 1; [and] Assist those most at risk during heat alerts by developing a community-specific response that considers the conditions and needs of people. This must provide for geographically-accessible cooling centres, including a west-end location, with transportation to assist those in need (Toronto Disaster Relief Committee 2005).

The City of Toronto had instituted extreme heat alerts in 2001 (extreme cold weather alerts began in 1996). The system included seven cooling centres – two each in Scarborough and North York, and one each in Etobicoke, East York and Toronto. The death of Richard Howell, however, indicated the need for a more specialized response for particularly vulnerable people living in rooming houses, some of whom were not able to use the cooling centres.

In 2007, the Parkdale Activity and Recreation Centre worked with a York University graduate student called Tanya Gulliver to conduct research into municipal responses to extreme heat. The fol-

lowing year, with funding from the city and York University, Gulliver and a team of eight “peer workers” established the West End Heat Registry as a pilot project (City of Toronto 2012). The project was repeated during the summer of 2009.

The team administered a questionnaire to local residents to identify those most at risk from extreme heat, such as those suffering from diabetes or asthma. The registry tracked about 80 people during extreme heat days, calling or visiting to check their condition and offer help (Baute 2008).

In 2012, the City published a detailed guide for other communities interested in the model (City of Toronto 2012), but as of 2017, it is not clear whether heat registries are being maintained in Parkdale or other neighbourhoods.

6.4 The Parkdale Neighbourhood Land Trust

In 2010, a new organization emerged in Parkdale with a different approach to rooming house preservation. The Parkdale Neighbourhood Land Trust draws on the idea of community land trusts (CLTs) to maintain the stock of existing rooming houses in the area. According to the organization’s website:

The idea for a CLT in Parkdale was seeded in 2010 through the Parkdale Peoples Economy, seeking to alleviate food security issues through a community land trust model. Through a series of community consultations that engaged over 100 community members and stakeholders, it evolved into an initiative to promote and enable community ownership of land, and to alleviate poverty through the lease of community-owned land to providers of affordable housing and affordable community and commercial services. PNLT was incorporated as a non-profit corporation in 2014, and is...run by the board of directors, consisting of local non-profit organizations and groups that represent the diversity of Parkdale. This includes the Parkdale Activity-Recreation Centre (PARC), The West End Food Co-Op, Greenest City, Roncesvalles-Macdonell Residents Association, Parkdale Community Legal Services, Parkdale Village BIA, St. Christopher House, and Sistering.

The organization studied land trusts in other countries and cities and invited speakers to explain to the group how a community land trust works and how it has been used in places such as Boston, Calgary, and London.

In May 2017, the organization published a rooming house study that tracked the decline in the number of Parkdale rooming houses and the numbers of people already displaced and at risk of displacement, and proposed a “10-year, coordinated, multi-partner Parkdale Rooming House Preservation Strategy to preserve, maintain, and develop this disappearing stock of affordable housing” (Parkdale Neighbourhood Land Trust 2017: 6).

7. “Drake...this is all your fault”: The conversion of residential hotels, 2000 to the present

In 2005, a new Starbucks coffee shop opened in a building at the corner of Queen Street West and Dovercourt. Even before the coffee shop opened, the newly stuccoed wall was graffitied with the words, “Drake, you ho, this is all your fault” (Whyte 2005).

The comment was aimed at the Drake Hotel, which had re-opened in 2004 after being converted from a single-room occupancy residential hotel to a boutique hotel with a bar and concert space on the ground floor (Drake Hotel n.d). It was widely viewed as a harbinger of gentrification in the area known as West Queen West, which is what was meant by “This is all your fault.”

However, the same comment could equally well have been aimed at the nearby Gladstone Hotel, which underwent a similar transformation between 2001 and 2005. In the latter case, the owners attempted to maintain accommodations for the residents, some of whom were elderly and frail, many of whom had lived there for years, and all of whom had low incomes, but as the renovation became more complicated, the residents had to be removed and settled elsewhere.²⁰

The precedent was set, and not just for gentrification in the immediate area. After the Gladstone and the Drake, which are a few blocks apart on Queen Street West, the next was the Rex Hotel, on Queen West at St. Patrick Street, which replaced a long-stay hotel with a tourist hotel over its existing jazz bar in 2006. In 2009, the Bay Street Motel was renovated to become the BeSixFifty boutique hotel. In 2015, the former Queen’s Hotel on Queen West reopened as the Roncey, with hotel rooms, artists’ studios, and event spaces. And in 2017, the Broadview Hotel on Queen Street East, a former strip club with rooms for rent on the upper floors, was reopened as a boutique hotel and restaurant.

Other residential hotels may share the same fate: the Palace Arms on King Street West was put up for sale in 2015 (White 2015) and the Waverly at College and Spadina is slated for redevelopment by its owners to create a student residence (Rayner 2017). A large rooming house at 235 Jarvis Street that was the site of a 2014 fire is also the subject of a development application (City of Toronto Community Planning 2015).

Although heritage advocates argued for the retention of the Waverly (which had a colourful history and long associations with the arts community) and local residents opposed the height of the proposed tower, an OMB decision in May 2015 cleared the way for redevelopment. The fate of the

20 The story is told in a film documentary, *Last Call at the Gladstone Hotel* (2007).

long-term tenants seemed to be of less interest than the history of the old building and the height of the new one.

What these buildings have in common is prominent locations on main streets in popular districts that have been the focus of reinvestment since the 1990s. And those that have been converted rather than demolished have distinctive 19th-century architectural features that make them attractive to renovators.

When a business is designated as a “hotel” rather than a rooming house or lodging house, the residents may have week-to-week rental arrangements instead of month-to-month, and therefore can be evicted with very short notice. In the case of the Queen’s Hotel, the new owners gave residents eight days to relocate. Local community workers and city staff had to scramble to help tenants find new accommodation (CBC News 2015).

One of the rare instances of a residential hotel remaining as such after a renovation is the Edwin Hotel on Queen East, which is now operated by Woodgreen Community Services (Monsebraaten 2010). However, this hotel is of little architectural interest and is close to the noisy Don Valley Parkway, so it is likely that developers did not view it as a likely prospect for a boutique hotel.

In August 2015, when the Queen’s Hotel tenants were being evicted, Toronto Councillor Mike Layton requested a study of “large single-room occupancy buildings” in the city. In an open letter to the city’s Affordable Housing Committee, he stated:

Because the City’s Official Plan policies and Chapter 667 of the Municipal Code (under S.111 of the *City of Toronto Act*) protect dwelling units, not dwelling rooms, these properties may be increasingly attractive to developers believing that no rental replacement will be required, and little or no tenant relocation assistance provided. It may be that the very success of the City’s rental protection framework has resulted in more development pressure being applied to these single-room occupancy sites. As they disappear, we do not have a replacement for them and our affordable housing stock is diminishing (Layton 2015).

The Toronto report on rooming houses published in October 2016 noted:

City Planning, in collaboration with SSHA [Shelter Support and Housing Administration], has initiated work on [Councillor Layton’s] request. To date, work has been focussed on identifying buildings considered to be “at risk” of redevelopment so that relevant City staff can be alerted to the potential need for a tenant relocation strategy and responding to active applications. This has resulted in the successful re-housing of tenants in a redevelopment project in the downtown. Staff will continue to work on this request and report back as requested in 2017 (City of Toronto 2016: 20).

The “successful re-housing” effort may refer to the work with the former tenants of the Queen’s Hotel or to the relocation of former tenants at the Broadview Hotel, undertaken with Woodgreen Community Services (Connelly 2015b). Although many of the most distinctive hotels have already been converted, not all the stock is gone; many rooms above older taverns remain. The extent to which these units are threatened depends on their location. As Joy Connelly notes:

Toronto’s Official Plan (2010) calls for growth, including residential and commercial intensification, in both the Downtown and along Avenues, where most residential hotels are locat-

ed....Along Gerrard, Danforth, Kingston Road and many other Avenues, the hotels are part of blocks of low-rise mixed-use buildings that lend themselves to intensification (Connelly 2015b: 6–7).

It would not, however, be accurate to say that the loss of affordable units is the direct result of the City's intensification policies. The City has been promoting intensification since the 1980s with varying results; what has changed is the market for urban dwellings. Developers find it profitable to add new buildings (both residential and commercial) in already built-up areas because demand for these buildings has risen since the 1980s.²¹

Another development that has changed the face of long-term-stay hotels is the Internet, which is widely used to book short-term accommodations. In 1995, I visited the Inglewood Arms, a large rooming house on Jarvis Street. It accommodated many formerly homeless men, and offered basic rooms for low-income tenants. I visited with a housing worker who helped run a breakfast club as a way to bring tenants together and create a greater feeling of community. Today, although the Inglewood Arms continues to house low-income adults, it is listed on sites such as Yelp and advertises “comfortable affordable accommodation in the heart of downtown Toronto.”²² Judging by the online reviews, its short-term guests appear to be mostly students on a tight budget.

Similarly, the Parkview Arms on Queen Street West has an elegant website²³ and calls itself “A Heritage Rooming House.” Twenty years ago, these rooming houses were not advertising tourist accommodation, but at the time, the use of the Internet in commerce was not well established. Now, it seems, tourists are competing with long-term renters for rooms in established rooming houses. And places such as the Inglewood Arms appear to have vacancies they need to fill.

Even more recently, concern has arisen over the effects of Internet platforms such as Airbnb,²⁴ which connect travellers with potential hosts. Although Airbnb's publicity suggests that the hosts are mainly resident homeowners with extra bedrooms to share, in fact, the short-term accommodations on offer may include houses that have been subdivided in a manner similar to that of rooming houses, run by off-site managers. At least one former licensed rooming house, at 180 Sherbourne Street, has been converted to what is essentially a small hotel, rented through Airbnb; an on-site manager runs the place, but the owner lives outside Toronto (Powell 2016c).

A detailed study by Sean Grisdale on the effects of Airbnb on Toronto's long-term rental market and on vacancy rates found that “the number of full-time listings in many downtown neighbourhoods is such that without them the vacancy rate could be more than doubled there” (Grisdale 2018: 76). He notes that “at a citywide scale, the number of full-time Airbnb listings clearly represents a significant cannibalization of existing long-term rental capacity” and that “full-time Airbnbs are...making as much or more than the average rental unit in many of these neighbourhoods without being subject to the responsibilities of the *Residential Tenancies Act* or those regulations re-

21 By contrast, Vancouver has preserved its SRO (single room occupancy) stock. Many residential hotels are run by the Portland Hotel Society and a city bylaw prevents the demolition or conversion of residential hotels in the downtown area (City of Vancouver 2015).

22 <https://www.yelp.ca/biz/inglewood-arms-hotel-Toronto>

23 <http://www.parkviewarms.ca/>

24 Other all-purpose sites, such as Craigslist and Kijiji, provide a similar service, but Airbnb specializes in accommodation and has become a global company with a high profile.

quired of the hotel industry” (77). At the same time, he acknowledges that “Airbnb’s impacts are tied to unintended consequences stemming from decades of housing policy...which, having limited the construction of purpose-built rentals in favour of individualized forms of homeownership, have made rental unit availability a function of the decisions of individual homeowners and speculator investors rather than a function of material housing supply” (138).²⁵

In December 2017, the City of Toronto passed a bylaw to regulate short-term rentals by creating a registry of operators, requiring that operators rent only their principal residence, and mandating that entire-unit rentals be restricted to 180 nights a year. This bylaw will come into effect in June 2018.²⁶ The effect of the new regulation on rooming houses may be negligible, however, since the conversions of rooming houses to make them attractive to tourists have already occurred, and those rooms will not be returned to their original use. Whether the bylaw will slow down further conversions remains to be seen.

25 In an unusual – if not to say perverse – development, the head of CMHC announced in 2017 that the organization was seeking to partner with Airbnb and Vacation Rental by Owner to increase the supply of affordable rental housing in Canadian cities (Press 2017).

26 Grisdale notes, “This legislation will ultimately come down to a question of enforcement, as some professional hosts I interviewed appeared confident they could continue under the proposed regulations” (Grisdale 2018: 137).

8. Studying Toronto's rooming house sector, 2004–2008

8.1 Rooming House Issues and Future Options, 2004

In 2003, David Miller was elected mayor, replacing Mel Lastman. In February 2004, he convened an Affordable Housing Summit. As the word “summit” suggests, it was very high level, and the resulting report consists of long lists of bullet points that include some good ideas, some platitudes, some expressions of frustration, but few practical actions that could be implemented right away (City of Toronto 2004). Among these bullet points was one that called for the “expansion of the rooming house licensing by-laws across the amalgamated city.”

Five years into amalgamation, the City of Toronto was still working on a harmonized zoning bylaw and still had no citywide licensing or zoning in place for rooming houses. This was not for a lack of information on the subject. In 2003, the City had commissioned SHS Inc., a firm that specialized in housing research, to study the rooming house sector in detail, using funding from the federal Supporting Community Partnership Initiatives (SCPI) fund. The consultants were asked to develop recommendations to (among other things) extend rooming house licensing to the areas that currently restricted rooming houses (Etobicoke and York) or did not permit them at all (North York, East York, and Scarborough).²⁷

The final report, *City of Toronto Rooming House Issues and Future Options*, along with its two accompanying background studies (SHS Inc. and Richard Drdla Associates 2004a, 2004b, 2004c), thoroughly documented Toronto's rooming house sector, as well as regulatory practices in other cities. The consultants surveyed and interviewed rooming house owners, operators, and tenants as well as visiting many rooming houses; analysed city data from licensing, finance, buildings, fire, planning, and public health and held discussions with staff in these departments; examined and assessed rooming house licensing programs in other cities and the effects of different approaches; and even combed through newspaper advertisements to identify unlicensed rooming houses throughout the city.

27 This was one of 11 reports commissioned using SCPI funding. “The first round of SCPI enabled the City to target research in specific areas to better understand and improve service systems and initiatives, and improve the understanding of homelessness and housing options in Toronto” (City of Toronto 2003a: 46). Other projects included a study of second suites and a study of evictions under the *Tenant Protection Act*.

The authors noted: “The term ‘rooming house’ is...no longer appropriate because the sector is changing so much. Furthermore, it carries a negative image that is unfair to the sector and undermines support for rooming houses” (SHS Inc. and Richard Drdla Associates 2004a: 24). Later, the authors state:

No specific recommendations are made regarding what the new name should be, but two possibilities have been identified. One is to call them “converted houses,” which is a term already used in the zoning provisions of the City, but which could be appropriated for this purpose. Another possibility is “multiple conversion dwellings,” which is currently used in Vancouver to describe virtually the same type of properties” (26).

The 37 recommendations were intended to protect and preserve rooming house stock as a valuable source of affordable housing. They included the following (SHS Inc. and Richard Drdla Associates 2004a: iii):

9. That an interim licensing and inspection program be initiated for existing unauthorized rooming houses that are identified by complaints or voluntarily until the new city-wide zoning is implemented. (Medium-term)
10. That a program be developed to identify the remaining existing rooming houses and to encourage owners of eligible rooming houses to apply for a license. (Long-term)
11. That a “conflict resolution process” or similar program be developed for approving and licensing whenever possible existing rooming houses that do not conform with the new city-wide zoning by-laws. (Long-term)
12. That the land-use regulations permit rooming houses in all residential and residential-commercial zones.
13. That the associated development conditions be limited to those addressing legitimate development concerns.

The report also commented on the difficulties inherent in regulating rooming houses. After studying rooming house regulation in 12 Canadian cities, the consultants noted that only three – Edmonton, Winnipeg, and Ottawa – were doing an effective job of proactively licensing rooming houses. However, “all of [these] cities significantly underestimated the time and effort needed to establish these programs – first to identify the large number of previously unsuspected stock and then to ensure that they met the applicable standards” (SHS Inc. and Richard Drdla Associates 2004a: 17). Certainly this had proved to be the case in Toronto with the Parkdale Pilot Project, which was still under way at the time and already over budget.

Otherwise, the authors noted:

The other examined cities [St John’s, Halifax, Dartmouth, Quebec City, Montreal, Etobicoke, Hamilton, Kitchener, and Vancouver] offered lessons in how not to regulate rooming houses. They typically have very restrictive zoning, but enforce it and their other regulations only when complaints are made. As a consequence, rooming houses have proliferated in these cities, but they know little about their number or their condition.

There are two reasons for their “turning a blind eye.” Addressing these properties after years of ignoring them would require the cities either to loosen their restrictive zoning, or to close a substantial amount of housing. Also, while it is widely recognized that effective enforcement depends upon pro-active and regular inspections, the cities have been unwilling to commit the considerable ongoing resources needed for them (17–18).

The amalgamated City of Toronto faced (and continues to face) the same dilemma in relation to unlicensed rooming houses in the former cities of North York, East York, and Scarborough. Many residents in these former cities oppose loosening the restrictions that prevented rooming houses from operating legally and some city councillors in those wards are unwilling to recognize existing rooming houses, presumably fearing the loss of potential votes in the next municipal election. However, rigorously enforcing the zoning bylaws that did not permit rooming houses in these areas would close dozens, perhaps hundreds, of rooming houses. The amalgamated City of Toronto is in a difficult situation and the temptation to “turn a blind eye” is understandable.

The Advisory Committee on Homeless and Socially Isolated Persons endorsed the study and its recommendations and in July 2006, forwarded it to the recently constituted Affordable Housing Committee.²⁸ This Committee asked the City’s Deputy City Manager and “Interdivisional Committee on Affordable Housing” to review the recommendations and “report back on a timely basis on a recommended strategy concerning rooming houses in Toronto” (City of Toronto, Affordable Housing Committee 2006: 5).

The rooming house study did not appear on any City of Toronto committee agenda in 2007. Still, members of the Rooming House Working Group²⁹ continued to press for change and in 2008, commissioned a further study to explore some areas that had not been included in the first report.

8.2 Making the invisible visible: unlicensed rooming houses, 2008

In 2008, East York East Toronto Family Resources and the Rooming House Working Group sponsored a two-part study by Oriole Research and Design to document (1) examples of good practices in rooming house management and (2) the lives of residents of unlicensed houses. The report was intended as a contribution to the city’s *Framework for Affordable Housing*.

The study used the term “shared accommodation” in the main title (*Shared Accommodation in Toronto: Successful Practices and Opportunities for Change in the Rooming House Sector*) and explained in the text that the authors wanted to avoid the negative stereotypes associated with the words “rooming house” (although the latter term was used routinely in the body of the report). The recommendations included one about changing the name, but no preferred term was put forward.

9. Combat the negative image of rooming houses by changing the term used to refer to this type of housing. For many, the term *rooming house* is associated with stereotypes about what properties look like, how they are maintained, who owns them and who lives there. These stereotypes are challenged by this study and other recent research. Describing this

28 The Affordable Housing Committee was established in 2005 and met for the first time in October 2005.

29 This group, which formed in the late 1990s, brought together landlords, tenants, and municipal and agency staff to discuss rooming house issues.

housing using neutral language can be a step towards fostering greater community acceptance of this type of accommodation (Oriole Research and Design Inc. 2008: xi).

Like the report by SHS Inc., the researchers grappled with the problem of a known term that had a negative connotation vs. potential terms that had no connotations at all and were therefore vague and unmemorable.³⁰

The report documented many examples of good management practices, but the most unusual part was its investigation of unlicensed rooming houses in Scarborough, North York, East York, York, and parts of Etobicoke. The researchers identified 44 potential interviewees with the help of housing workers in community agencies (mainly drop-in centres across the city) and of rooming house landlords themselves. These 44 (32 men, 12 women) completed a survey and of those, 21 (14 men, 7 women) were selected for one-hour interviews.

Interestingly, “Criteria for inclusion in the longer interview included the participants reporting satisfaction with at least some aspects of their housing situation” (Oriole Research and Design Inc. 2008: 65). The researchers were looking for positive stories and good management practices in these interviews. Since many of the contacts came from drop-in centre staff, the recruitment process tended to leave out those with day jobs as well as isolated individuals who did not use drop-ins. To compensate for the small number of participants and the skewed recruitment process, the researchers compared their findings with those of earlier surveys, including the Hwang et al. (2003) study.

One noteworthy finding, and one that was not part of earlier surveys, was the fact that many of those who participated were parents. As the authors note:

More than half of the tenants we surveyed are parents (52 percent). This is an interesting statistic, as it suggests potential family connections while challenging the stereotype of a “typical” rooming house tenant being someone without familial connection to others. Regardless of marital or family status, rooming house accommodation means that the vast majority of tenants do not live with a related family member (Oriole Research and Design Inc. 2008: 68).

Since much of the opposition to rooming houses from homeowners in certain suburban neighbourhoods is based on a view of roomers as unattached, transient individuals, findings such as these are useful in countering prevailing stereotypes.

Another interesting finding was that “almost half of the study respondents had been in their current residence for two or more years, with more than a quarter of study participants reporting living at the same residence for more than three years” (Oriole Research and Design Inc. 2008: 73). And “46 percent of tenants stated they had no plan to move in the foreseeable future” (74).

What is unique to this study are the comments about why the tenants lived in unlicensed rooming houses outside the city core. Some said they preferred a room in a house to an apartment; some appreciated having access to a yard; some liked the lower densities of the inner suburbs; others spoke about a sense of community. “Several tenants talked about wanting and needing to live outside of the downtown core, stating that it was ‘too easy to be in the wrong place at the wrong time’

30 Not to mention unfindable – creating a new name also involves difficulties in online information searches.

downtown” (79). Quite a few appreciated that these were smaller houses with fewer tenants (relative to the large rooming houses in some parts of downtown Toronto), which felt more comfortable.

These opinions and attitudes tend to go unreported, since it is difficult to identify, let alone interview people in so-called “illegal” housing arrangements.³¹ Many tenants in places like North York and Scarborough prefer to live there in a shared housing arrangement and many landlords are willing to operate in this regulatory grey zone.

Together, these two studies – *Rooming House Issues and Future Options* (2004) and *Shared Accommodations in Toronto* (2008) – helped inform the city’s first attempt to deal with the zoning and licensing inconsistencies in the amalgamated city, which began in late 2008. But before I describe that process, it may be helpful to situate the discussion in the context of human rights.

31 At a meeting organized by Social Planning Toronto in July 2017, a rooming house tenant and a housing support worker spoke of the difficulty of getting tenants from unlicensed rooming houses to come forward with their stories. During public consultations on rooming houses in the summers of 2015 and 2017, rooming house tenants were put off by sign-in sheets that required them to indicate their address, fearing that this information might lead the city to shut down their housing.

9. NIMBYism, human rights, and rooming houses, 2008–2013

The 2004 report made no mention of human rights in relation to rental housing, despite a growing body of research on the subject.³² The 2008 EYET report did not discuss the issue of housing and human rights directly, but mentioned a resource called *Yes in my Back Yard: A Guide for Ontario's Supportive Housing Providers*³³ intended to help housing providers overcome discrimination against supportive housing for those with mental health issues.

Discrimination against low-income renters in general and rooming house residents in particular is a long-standing problem (Campsie 1995), but constructive action to counter this type of discrimination has been lacking. Human rights legislation does not protect against discrimination on the basis of low income or socio-economic status alone, although it does protect individuals receiving social assistance from discrimination. But a non-disabled, non-racialized student or member of the working poor might not be able to seek relief from discrimination in the housing market on human rights grounds.

In 2007, the Ontario Human Rights Commission launched a consultation on the question of human rights in the rental housing sector. The background paper prepared for the consultation, titled “Human Rights and Rental Housing in Ontario” (Ontario Human Rights Commission 2007) made no specific mention of rooming houses and focused mainly on social housing providers, at-risk groups, and the forms that discrimination might take. The 2008 report of the actual consultation, however, had a lot to say about rooming houses. “Much of the discussion about housing in the private rental market focussed on rooming houses and basement apartments” (Ontario Human Rights Commission 2008: 65).

For example, the Commission found that merely having lived in a rooming house could be a barrier to finding alternative types of housing:

In some cases, references are viewed as being unsuitable because of the nature of the housing previously occupied... landlords [may] refuse to accept tenants whose only references are from rooming houses (33).

32 Much of this research focused on housing providers' discrimination against immigrants to Canada on the basis of ethnic origin or race. See, for example, Dion (2001); Hulchanski (1997); Murdie (2002).

33 It was created by a group called HomeComing Community Choice Coalition, “a coalition of supportive housing providers, planners, human rights lawyers, advocates for people with mental illness, and citizens who share our values” (HomeComing Community Choice Coalition 2005: 4). The resource was prepared in 2003 and updated in 2005.

A section on the private rental market raised the question of regulation and the proliferation of unlicensed and unregulated rooming houses:

As a result of restrictions on legally registered rooming houses, the Commission heard widespread concerns about the growth of un-regulated and un-inspected rooming houses to fill this void in the housing market and the substandard rental conditions their occupants may be subjected to (66).

Another issue was NIMBYism on the part of people who had converted older rooming houses to single-family dwellings and thereafter opposed the preservation or establishment of other rooming houses in the neighbourhood. The report cites a housing worker from Regent Park:

In Cabbagetown, which has experienced gentrification like perhaps no other area in the city, the number of rooming houses has decreased dramatically. The former rooming houses have been re-converted into single family homes. This is fine as it goes. However, our experience is that the new homeowners have become, at times, simply anti-rooming houses, not wanting “those people” in their neighbourhood and being concerned primarily with property values (Project Connect) (67).

The report picked up on the expression “those people” and how the term was used in public consultations.

People who do not think of themselves as being prejudiced or discriminatory will say “we don’t want ‘those people’ in our neighbourhood,” “those people will bring our property values down,” or “we don’t want those people unsupervised around our children.” It appears that the human rights implications of these kinds of comments when made, for example in public meetings, in letters to city councillors or on community group websites are often not recognized or challenged, even by people who might otherwise view themselves as tolerant and respectful citizens or leaders (84).

But beyond these obvious displays of discrimination by individuals, the Commission identified a set of systemic barriers to affordable housing built right into the planning process. The report tackled the question of zoning and licensing that prohibited certain kinds of dwellings in certain areas (such as those that prohibited rooming houses in North York and Scarborough) and thereby prevented low-income people from living in certain areas.

Concerns were raised about by-laws that aim to keep out certain types of housing developments while allowing others. For example, the Commission heard that zoning by-laws and policies in municipalities across the province prohibit rooming houses in certain neighbourhoods. Consultees such as Project Connect told the Commission that these kinds of zoning by-laws mean that people who rely on rooming houses, and who may be protected by *Code* grounds, are effectively denied a place in the community of their choice. They may also have to accept housing that does not meet their needs, whether because the living conditions are substandard or because it is far from their supports, family members and social networks (Rupert Coalition) (80).

Applied to Toronto, this would mean that even if you were born and brought up in, say, North York, where you had family, friends, work, or community resources you depended on, and all you could

afford was a room in a house with other roomers, your only option was an unlicensed rooming house, operating out of official sight, not subject to regulation or inspection.

The OHRC report singled out six instruments of planning and development control that could affect rooming houses (as well as supportive housing or group homes):

1. Zoning definitions used to zone out or restrict access to certain neighbourhoods by certain people protected by the Code
2. By-laws that limited or banned certain types of affordable housing developments
3. Distancing requirements (such as minimum distance separations for group homes)
4. Development moratoria (that is, by-laws temporarily freezing development of land for up to two years)
5. Extra forms of public consultation not required under the *Planning Act*, which entailed extra expense for the housing provider and exposed potential tenants to verbal abuse
6. Design compromises or requirements and community contracts (such as requiring windows that do not open, prohibiting balconies, or creating “visual buffering” between a proposed development and existing houses) (78–83).

The 47 recommendations in the OHRC report included many aimed at treating housing as a human right, preventing discrimination by individual or corporate housing providers, and accommodating people with disabilities in housing. Only one addressed dismantling planning barriers to creating housing for low-income people or other vulnerable population, and that was directed at the Commission itself:

44. If the Commission identifies municipal by-laws or other practices that contribute to NIMBYism relating to prohibited grounds of discrimination, it will consider the strategic use of its powers to have these addressed. This may include public inquiries, education, and supporting or initiating a human rights application or *Charter* case to challenge those by-laws or practices (96).

Indeed, the Commission did just that in 2013. A *Charter* case brought by the Dream Team, an advocacy group for consumer-survivors, successfully led to Toronto’s removal of the requirement for a minimum distance separation for a group home or residential care home of “250 metres from a lot with a group home or residential care home, measured in a straight line from nearest lot line to nearest lot line.” This wording from the 2013 Toronto Zoning Bylaw was deleted in 2014 through Toronto By-law 0550-2014.³⁴

The year after the release of the OHRC report, in August 2009, the City released the *Toronto Housing Charter: Opportunity for All*, signed by Mayor David Miller, which stated:

- 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.

34 The Dream Team also brought about similar changes in Sarnia, Kitchener, and Smiths Falls (Dufresne 2014).

- All residents have the right to equal treatment in housing without discrimination as provided by the Ontario Human Rights Code, and to be protected from discriminatory practices which limit their housing opportunities.
- All housing in Toronto should be maintained and operated in a good and safe state of repair (City of Toronto 2009b).

Meanwhile, the Commission continued to press for human rights in housing through the publication of two documents intended to be accessible to a wide audience, which expanded on many of the themes in the 2008 report. In 2011, the Commission published *In the Zone: Housing, Human Rights, and Municipal Planning*, and, in 2013, *Room for Everyone: Human Rights and Rental Housing Licensing* (Ontario Human Rights Commission 2011, 2013). These booklets focused on regulatory instruments and their role in either reinforcing or reducing discrimination in housing. The first looked at zoning; the second at licensing. In the latter, the OHRC offered 13 recommendations for municipalities embarking on a rental licensing program.³⁵

One recommendation stated that bylaws should not be applied to certain parts of a municipality only:

If a bylaw is meant to serve legitimate planning or safety purposes, it should be needed by – and applied to – every part of the municipality. A bylaw that is applied first or only to a particular area of the municipality is more likely to be arbitrary, and could be seen to be targeting the people within that particular area (Ontario Human Rights Commission 2013: 14).

All of which suggests that Toronto's current situation, in which rooming houses are permitted in some places and not in others, and licensing is not available in certain parts of the city, contravenes human rights legislation and practice. However, this situation has not (yet) become the subject of a *Charter* challenge. Part of the problem lies in the fact that rooming house residents as a group do not form a uniform group that could mount a single, unified challenge, unlike those who challenged the minimum separation distance for group homes. As a lawyer has noted:

The cohesive nature of the adversely affected group – disabled group home residents – assisted ACTO in identifying the harm caused by the bylaw to a specific demographic and demonstrating *prima facie* discrimination. Establishing a *prima facie* discrimination claim in the regulation of rooming houses and other forms of affordable housing is more difficult because they are not defined by the characteristics of their residents and they do not serve a cohesive group of individuals that fall within a single *Code* ground, even though it is well established that they serve vulnerable groups protected by human rights legislation... While bylaws limiting access to rooming house accommodation adversely impact individuals protected by the *Code*, the unifying trait of rooming house residents is not a basis for a discrimination claim in Ontario, as “poverty” or “social condition” is not a prohibited ground in Ontario (Roher 2016).

35 1. Consider the Ontario *Human Rights Code* before drafting the bylaw and refer to the *Code* in the bylaw; 2. Consult with *Code*-protected groups; 3. Make sure that meetings about the bylaw do not discriminate; 4. Roll out the bylaw in a consistent, non-discriminatory way; 5. Work to secure existing rental stock; 6. Avoid arbitrary bedroom caps; 7. Avoid gross floor area requirements that exceed the Building Code; 8. Eliminate per-person floor area requirements; 9. Eliminate minimum separation distances; 10. Enforce the bylaw against the property owner, not the tenants; 11. Protect tenants in cases of rental shut down; 12. Monitor for impacts on *Code* groups; 13. Make sure licensing fees are fair.

Inconsistency is not the only human rights issue inherent in rooming house regulation. Mariana Valverde in *Everyday Law on the Street* (2012), in a chapter called “Law without Rights,” identifies a human rights issue in the licensing process itself.

The municipal code states that notice of an application for a rooming house license shall be given to the local councillor, and that the license will be issued only “if there are no outstanding complaints with respect to the rooming house or objections to the application.”

Thus, if I have a noisy family living next to me, there is little that either I or city officials can do. But if the people next door are singles receiving welfare or disability payments and living in a legal rooming house, then I have an automatic right to voice my opinions about them to officials who hold the all-important threat of denying the proprietor a license renewal. In other words, neighbors wield a power that – especially if their feelings about rooming house tenants as a class are shared by the local councilor – can deny housing to those who are already less empowered and more marginalized not only economically but from the point of view of citizenship (119).

Given this intrusion of what she calls “nosy neighbours” and “moralizing councillors” into the affairs of rooming house operators and their tenants, Valverde poses an important question:

Is the current system worth extending to the whole city? The current provisions for community notification and input are particularly problematic, since neighbors who do not object are highly unlikely to show up, phone, or e-mail either the licensing authority or the councillor, whereas those who harbor fears and dislikes based on prejudice are much more likely to make their voices heard... the process exposes vulnerable people (and providers of low-rent housing for singles) to attack from both officialdom and neighbors (121).

It is an important question, but a difficult one to answer. Advocates for rooming houses routinely call for the extension of the current system of licensing to all areas of the amalgamated city. But if the current system is flawed, then simply replicating it elsewhere may not ensure fairness or equal treatment for tenants.

Lisa Freeman (2013: 263) also notes what she called “singular and seemingly excessive administrative attention” focused on licensed rooming houses.

Why do rooming houses have a regulatory structure separate from city divisions addressing emergency shelters, hostels and social housing? ...This administrative focus appeared to be an hoc result of, and a solution to, 30 years of disparate and ineffective regulatory practices of approximately 17 municipal committees with rooming houses in their purview... This singular and seemingly excessive administrative attention keeps rooming houses on the governmental radar; but this web of governance is far from a perfect solution.

At present, tenants of unlicensed houses are not subject to the same type of scrutiny (which may occur whenever a license is renewed). There is value to remaining “under the radar” for landlords and tenants alike.

10. Apartment licensing and regulatory dilemmas, 2007–2008

Licensing poses many practical problems that go beyond questions of human rights. These came to light when the City of Toronto investigated the question of whether rental apartment buildings or their owners should be licensed. The process may contain some lessons for rooming houses.

In the 1990s, the construction of new rental housing in Toronto had largely come to a halt.³⁶ The existing stock of affordable apartments was aging and many were in need of repair, particularly those built in the 1960s and 1970s. Concerned about the loss of rental stock and the condition of aging buildings, the City considered ways to ensure better maintenance and conservation of privately owned apartment buildings.

With the passage of the *City of Toronto Act* in 2006, the city had gained the authority to license apartment buildings. In 2007, Municipal Licensing and Standards (MLS) was asked to carry out research and consultation to determine the best way to enforce standards in apartment buildings, including licensing options (City of Toronto Municipal Licensing and Standards 2007).

MLS consulted with other departments, including Fire, Buildings, Planning, and Shelter Housing and Support, and with representatives of tenants' groups and landlords' organizations. Staff also carried out research on regimes in other cities: New York, Los Angeles, Milwaukee, Vancouver, and Regina. Finally, MLS held open houses in locations around the city at which participants were presented with a range of options for monitoring and maintaining standards, including two forms of licensing: either for the rental providers or for the individual buildings.

In a report dated October 2008, MLS staff analysed the options based on the research and consultations, and had this to say about licensing rental providers and the question of what would happen if landlords did not or could not comply with the requirements:

A suspended licence, for example, would have to prevent a rental provider from renting any further units until all substantial outstanding matters were resolved. A revoked licence could be much more problematic, as it suggests that the landlord should no longer be allowed to operate the building... if it is not revocable, then the point of a licence would seem highly questionable. And if it is, a clear process to manage the consequences of revocation would

36 For a review of the factors leading to the decline of rental housing construction, see Toronto Urban Development Roundtable (2001).

be necessary. ... Proper measures would have to be in place to ensure the tenants are protected. What if the offending licensee is not able, or refuses, to divest? What actions would the City be willing to undertake and at what cost? Finally, how would a licensing system be applied to City-administered social housing? ... The substantive enforcement issues make this option, in the view of staff, considerably problematic (City of Toronto Municipal Licensing and Standards 2008: 34).

The same questions applied to the licensing of individual buildings: what happened if the license had to be revoked?

Despite an obvious need for there to be credible consequences in the instance when a licence is revoked, it is just as important that any licensing system not lead to the unresolved de-housing of tenants. Although perhaps manageable on a smaller scale, these conflicting issues make licensing, especially with respect to high-rise buildings, a practically unworkable proposition (City of Toronto Municipal Licensing and Standards 2008: 36).

Many of the same dilemmas apply to rooming houses. Licences work only if the removal of the licence is a real threat to an operator, and a point of leverage that bylaw enforcement officers can use to compel compliance. However, revoking a licence can lead to the de-housing of the tenants (even if MLS considered this option “manageable on a smaller scale”). If removing a licence is an “unworkable proposition,” then enforcement is extremely difficult.

An analysis was also carried out by the Canadian Urban Institute for the Greater Toronto Apartments Association. The report identified four problems that the City wanted to solve:

1. the failure of the existing system to ensure adequate enforcement of property standards, including a perceived leniency in the treatment of landlords who violate property standards;
2. the reluctance of some low-income or immigrant rental tenants to use the complaint-based reporting system;
3. a critical shortage of trained inspection staff;
4. a high proportion of aging building stock, some of it in poor repair. (CUI 2008: ii).

For the question of enforcement, the research showed that since the majority of problems came from a minority of landlords, “a licensing program that imposes costs on both those who comply and those who do not would seem to be inequitable. Why should good landlords have to pay a fee that allows the city to go after bad landlords?” (CUI 2008: 35). Moreover, licensing would have no effect on the treatment of landlords in courts and tribunals.

As for encouraging tenants to complain about maintenance problems, the solutions lay in making the complaint system more user-friendly and ensuring more regular and more thorough building audits.

The shortage of trained staff was a question of city resources. Licensing would raise some money towards enforcement, but since landlords would simply build the fees into rents, the money would actually be paid by tenants, many of whom had low incomes. The report suggested that “The social benefit of improving living conditions for these low-income households should be paid for in the same way as other social programs: through general, progressive taxes.” (CUI 2008: 37).

Finally, the aging of the building stock, which called for long-term conservation efforts and a renewed building program, was not a problem that licensing could solve.

The report also identified some unintended consequences of licensing, drawn from experiences in other cities.

A pitfall of licensing programs is that they evolve with time, and each time the program is changed, new layers of requirements are added. ... Bardach and Kagan [1982] call this the “regulatory ratchet.” Regulation tends to be additive. When new measures are added, old ones are not removed. Some cities try to do too much with a regulatory program (CUI 2008: 25).

The CUI report concluded that apartment licensing was “a solution in search of a problem.”

In the end, the City decided on an improved building audit and enforcement program without licensing. This program was launched in December 2008. After about five years, the original program was deemed to be inefficient and was overhauled. Among other changes, the City established clear protocols for dealing with landlords, as well as a risk-assessment tool to identify properties most in need of full audits. The City also worked to improve communications with tenants.

Despite these improvements, in 2014 the City once again raised the question of licensing for apartment landlords (City of Toronto Municipal Standards and Licensing 2014). Once again, staff carried out research and consultations. Their report, delivered in November 2016, stated (once again):

Findings confirm that a regulatory approach through licensing does not present any advantages over other regulatory tools authorized by the *City of Toronto Act*, 2006 and may actually create additional complexities that would not contribute to the program’s goals of bringing rental apartment buildings into compliance. The evaluation confirmed that the enactment of a regulatory bylaw, instead of a licensing bylaw, would provide the City with the necessary authority to accomplish the City’s mandate of consumer protection, safety and wellbeing of its citizens, and fulfill public expectations, while avoiding potential hindrances to obtaining compliance (City of Toronto Municipal Licensing and Standards 2016b: 1).

Under the proposed regulatory bylaw, apartment landlords would be required to:

- a. register the building with the City of Toronto and submit required information;
- b. have a process for receiving, tracking and responding to tenant repair requests;
- c. notify tenants of service disruptions, property standards appeals, work orders and cleaning plan,
- d. install a notification board in a central location;
- e. use licensed pest management professionals;³⁷

37 In the middle of the decade, bedbugs in Toronto had become a public health concern. A 2008 Toronto Public Health report notes: “Bed bug infestations were reported in a range of residences including single family homes, student residences, condominiums, apartment buildings, hostels, rooming houses and shelters. Apartment units were the most commonly infested type of residence, making up 78% of all complaints/requests for service... Public Health Inspectors also reported that a significant number of requests for action were being received from the most vulnerable people in our community including residents living with physical and mental disabilities, the elderly and those living in

- f. have a waste management plan;
- g. have a cleaning plan;
- h. use contractors with certification from Ontario College of Trades to conduct maintenance of HVAC and plumbing systems
- i. have a state of good repair capital plan; and
- j. pay all applicable fees. (City of Toronto Municipal Licensing and Standards 2016b: 2)

Are there lessons here for rooming houses? All four of the problems associated with apartment buildings also apply to rooming houses: problems with property standards; the reluctance of tenants to complain to city officials; a shortage of inspection staff; and – at least in the older parts of the city – aging building stock. The two main differences are that (1) apartments are very visible and rooming houses are largely invisible and that (2) rooming houses are smaller scale and less physically complex than apartment buildings.

Licensing (or the less onerous option of registering, as recommended for apartments) would make rooming houses visible – provided that the owner-operators are willing to participate in a such a program. Incentives are usually required to encourage participation, but as the Parkdale Pilot Project showed, sometimes even those do not work. As for the question of scale, if the measures proposed are sufficient for buildings with hundreds of tenants, they should be adequate for those with as few as four, without the need for additional requirements.

The program for auditing apartment buildings has been tested over time and MLS staff have experience in implementing the tools. This experience may prove useful as the City moves to expand an existing licensing regime to rooming houses in the coming years.

poverty” (City of Toronto Public Health 2008: 3). The fact that 78 percent of complaints were being received from apartment residents may not, however, indicate that they were, in fact, the “most commonly infested” units. Bedbugs in rooming houses were also common, but their residents may not necessarily have made this fact known to Public Health.

11. A first attempt at a citywide zoning bylaw, 2008–2013

On June 16, 2008, Toronto's Affordable Housing Committee formally requested a review of the feasibility of extending zoning for rooming houses to the entire amalgamated city, as well as citywide licensing for rooming houses. A Toronto planning report dated October 28, 2008, set out a tentative schedule.

City Planning staff is targeting the first part of 2009 for a draft zoning by-law for the City, harmonizing the current zoning by-laws for the former municipalities. This draft will include a proposed definition of rooming houses and deal with the range of provisions and regulations for rooming houses in current zoning by-laws (City of Toronto Planning and Growth Management Committee: 2).

In fact, the question of rooming houses was hived off and dealt with separately. A report to the Planning and Growth Management Committee dated January 8, 2009, explained that consideration of extending zoning and licensing regulations of rooming houses would have to await the release of (a) the new draft zoning by-law and (b) the ten-year affordable housing framework. Both documents were released in 2009.

The Affordable Housing Action Plan, known as *Housing Opportunities Toronto*, was released in May 2009 and adopted in August 2009 (City of Toronto, 2009a). The draft plan contained the following recommendation:

31. Preserve and expand the supply of affordable housing available to single persons by: a. Encouraging and permitting an increase in legal, well-run rooming houses and other appropriate forms of housing. b. Providing training and other supports to landlords and operators to assist them to improve and maintain the rooming house stock.

Before its approval on August 5, 2009, however, the following change was proposed and carried:

Recommendation 31a. be amended so that it reads as follows:

“a. Encouraging and permitting an increase in legal, well run rooming houses and other appropriate forms of housing *where current zoning by-laws allow, and subject to any future changes to the zoning by-law.*” [italics added]

The change reflected city councillors' anxiety about extending approval for rooming houses to areas in which they were not yet permitted.

On December 14, 2009, City Planning released its rooming house report with recommendations. The report included a proposed definition for rooming houses:

- a building or part of a building that:
 - (i) contains a minimum of 4 rooms, each of which:
 - (a) is designed or intended for use as separate living accommodation; and
 - (b) may contain food preparation facilities or sanitary facilities, but not both; and
 - (ii) may contain one dwelling unit [that is, a self-contained unit for an owner or manager]; and
 - (iii) is not a group home, residential care home, nursing home, retirement home, seniors community house, religious residence, student residence, tourist home, or hotel (10).

The report recommended permitting rooming houses

in Residential Multiple (RM) zones, where five or more units are permitted, Residential Apartment (RA) zones, Commercial Residential (CR) zones, Commercial Residential Employment (CRE) zones and those parts of the Residential (R) zone in the Draft Zoning By-law that coincide with the existing provisions for Rooming Houses found in the R2, R3, R4 and R4A zones in the former City of Toronto Zoning By-law (2).

In other words, rooming houses would continue to be treated differently in different parts of the city. In the former City of Toronto, they would continue to be allowed in residential neighbourhoods; elsewhere, they would be relegated to areas with apartment blocks and commercial enterprises – in practice, this meant that they were restricted to major roads and prohibited on purely residential streets. The report contained a map showing where rooming houses would be allowed (see Figure 6).

The report noted:

The requirement that a rooming house contain a minimum of 4 rooms, together with the possibility of a dwelling unit, acknowledges a certain level of intensity with respect to use. As such, rooming houses would be compatible in zones that permit multiple unit residential buildings (10).

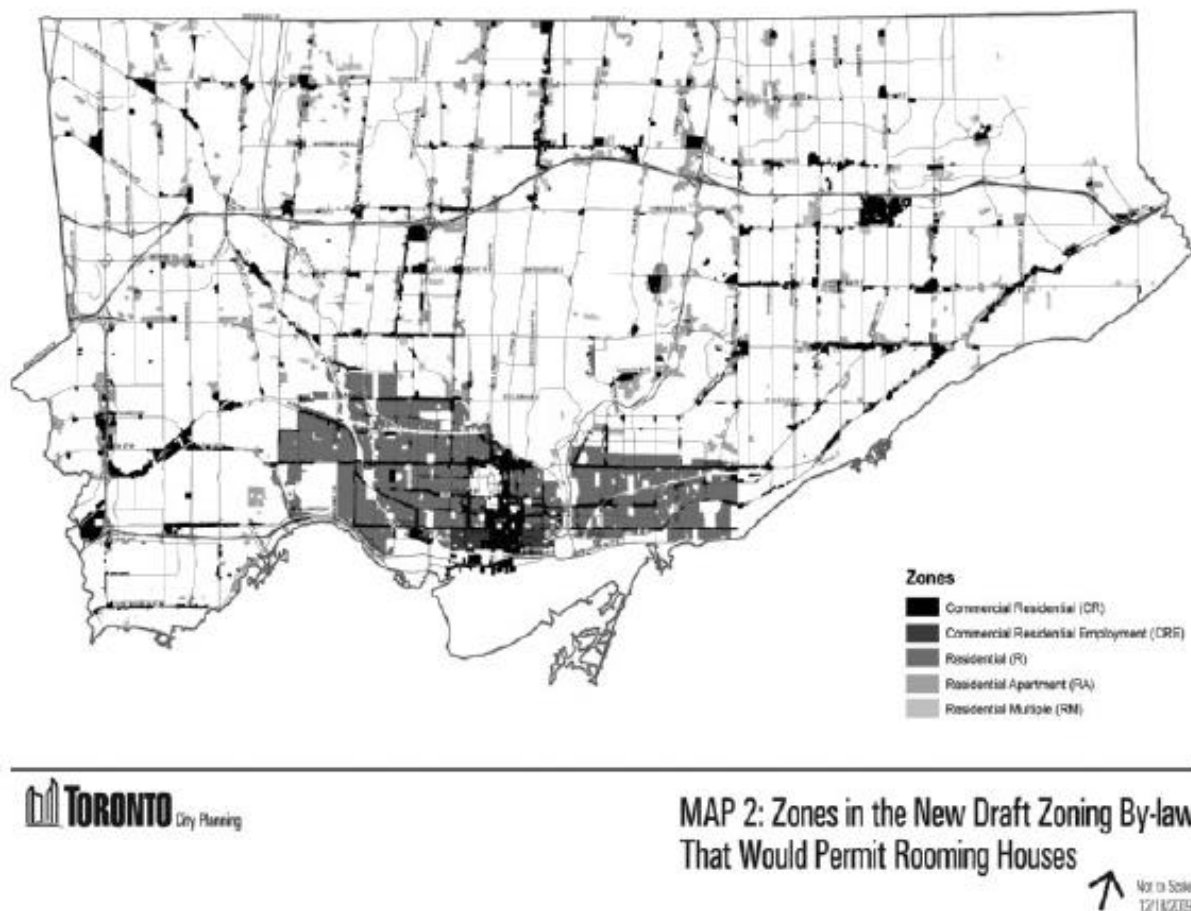
Ostensibly, this rationale explained why rooming houses would not be permitted in residential areas, but it did not explain why the rule applied only *outside* the former City of Toronto.

The report went to the Planning and Growth Management Committee on January 6, 2010. Nine speakers addressed the committee. Some argued that the recommendations went too far; others that they did not go far enough. The Planning and Growth Management Committee did not commit itself either way. The recommendations note that the Committee:

1. deferred the item to the next term of Council to allow open dialogue and consultation between elected representatives and affected communities regarding the proposed legalization of rooming houses in neighbourhoods where they are not currently allowed; and
2. requested that the item be brought back to the Committee by the Chair, following consultation with interested Members of Council, no later than November 2011.

So that was that. After two and half years of work on rooming house zoning, the problem would be pushed back for almost another two years, to allow for more consultation.

Figure 6: Proposal for extending rooming house zoning, 2009



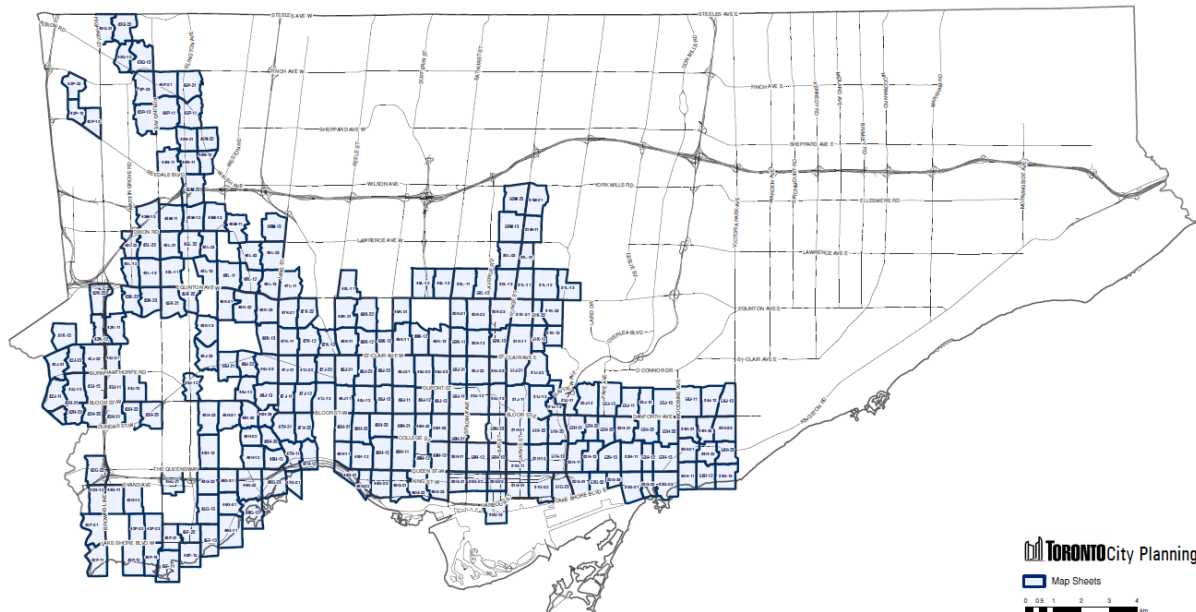
Meanwhile, in August 2009 City Planning tabled City of Toronto By-law No. 1156-2010, the new “harmonized” zoning bylaw. Since there was still no agreement on whether or how to extend rooming house zoning and licensing across the city, the zoning bylaw contained a “Rooming House overlay,” indicating where certain types of rooming houses were already permitted by existing zoning. Figure 7 shows the index map.³⁸

38 Retrieved from <http://www.Toronto.ca/legdocs/bylaws/2010/law1156-Schedule-A.htm>

Figure 7: Index map of Rooming House Overlay, 2009

Index Map

Rooming House Overlay Maps



North York, East York and Scarborough were conspicuous by their absence.

Figure 8 provides an example of one of these overlay maps, for the area immediately west of the University of Toronto.

As this example shows, the zoning excluded some residential areas entirely. Where they were permitted, rooming houses were sorted into 11 categories, defined in section 150.25 of the bylaw and shown in 11 different colours on the maps. Each category had detailed requirements for room size, sanitary facilities, exterior alterations, parking requirements, landscaping, and so forth. A1 (a category unique to Etobicoke and indeed, the *only* category found in that “ghost jurisdiction”³⁹) and C1 (a similar category, but found in the ghost jurisdiction of York) denoted rooming houses with a live-in owner-operator; these rooming houses were subject to a 300-metre minimum distance separation from other similar rooming houses and from group homes or crisis care shelters.

Most rooming houses were in the B category (which applied to Toronto): B1 had a maximum of 6 rooms, B2 allowed for up to 12 rooms, B3 up to 25, B4 grandfathered rooming houses that had been in operation as of 1953 and included some special provisions; B5 applied to rooming houses dating from 1975 with a lowered parking requirement, B6 applied to rooming houses dating from 1983 with other provisions...and so on. It was all very complicated. Nor was it clear how these requirements would fit with licensing regulations.

39 This distinction is not stated in the bylaw itself, but is evident from the rooming house overlay maps.

Figure 8: Sample Rooming House Overlay map, 2009



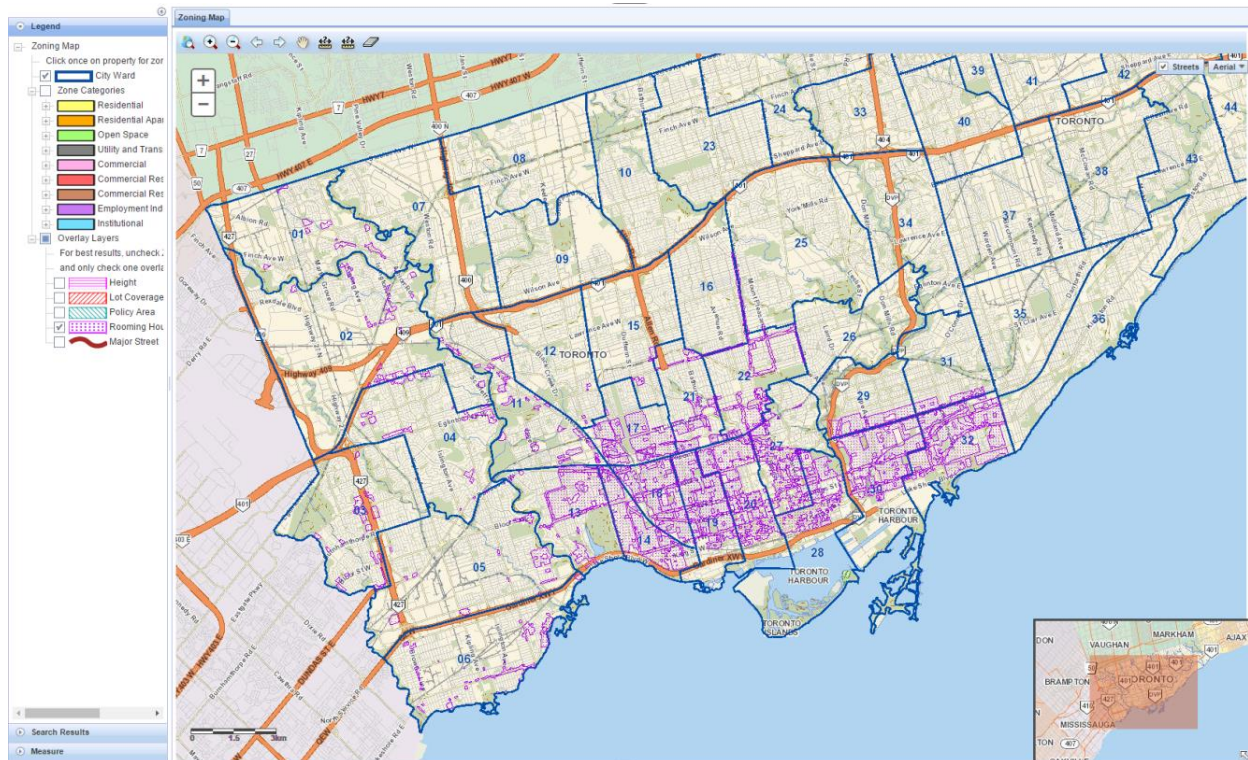
The bylaw caused dismay among those who wanted to see rooming houses permitted and licensed as of right in all parts of the city, including residential areas. On September 30, 2010, the Advocacy Centre for Tenants Ontario (ACTO) launched a challenge to the bylaw, stating:

The decision of the Council to enact the provisions of the By-law in respect of rooming houses including Section 150.25 of Schedule “A” and the Rooming House Overlay is contrary to good planning and is inconsistent with the terms of the Provincial Policy Statement 2005, the policies contained in the City of Toronto’s Affordable Housing Action Plan 2010-2020 and the principles of the Toronto Housing Charter (Hale 2010).

ACTO’s was only one of 694 appeals against the many provisions of the proposed zoning bylaw launched by groups and individuals in 2010 (d’Abramo 2013). At the same time, City Planning had become bogged down by requirements to consider both old and new zoning requirements for new developments, in a city that received about 35,000 requests for building permits each year. To break the logjam, in May 2011, under Mayor Rob Ford (who had been elected in 2010), the City of Toronto repealed the zoning bylaw and restarted the process.

After two more years of work by City Planning, a new approach to zoning was approved by Council in 2013 as Bylaw 569-2013. The rooming house categories were reduced from 11 to 5, but rooming houses were still not permitted in North York, East York, or Scarborough, and only in the same sites in Etobicoke as before. The existing rooming house overlay became part of an online, interactive map.

Figure 9: City of Toronto online zoning map, showing rooming house overlay, 2013



As of spring 2018, the Rooming House section of the bylaw is not yet in force, and is still under appeal at the Ontario Municipal Board. Therefore, rooming houses remain subject to the same regulations that predated amalgamation (and thus to the bylaws of “ghost jurisdictions”). Twenty years into Toronto’s amalgamation, there have been no regulatory changes and no “harmonization” of bylaws pertaining to rooming houses, despite years of studies and consultations on the subject.

12. Toronto Community Housing rooming houses: sale or transfer? 2012–2016

With the amalgamation of Toronto, its two social housing providers – the Metropolitan Toronto Housing Company and Cityhome – also had to amalgamate in 1999, creating an organization called the Toronto Housing Company.

The following year, the provincial government introduced the *Social Housing Reform Act*, the purpose of which was to transfer provincially owned social housing to Ontario municipalities.⁴⁰ This move was part of the provincial Conservatives' determination to "get out of the housing business."⁴¹ It led to a second amalgamation, that of the Toronto Housing Company with the Metropolitan Toronto Housing Corporation (which had managed provincial public housing in the city) and the formation of the Toronto Community Housing Corporation in 2002. The merger created an organization with a portfolio of more than 2,000 properties of all sizes and types in all parts of the amalgamated city, but with limited resources for upkeep. These properties included about two dozen City-owned rooming houses in the Cabbagetown area, mostly on Parliament, Winchester, and Carlton Streets.⁴²

Ten years after the establishment of Toronto Community Housing, Toronto's Executive Committee received a report titled "Securing Funding to Repair Toronto Community Housing's Multi-Residential Portfolio: Sale of Toronto Community Housing Stand-Alone Units." The report requested Council's

40 "The social housing transfer took place in two stages. In the first stage, implemented in January 2001, the province transferred the ownership and administration of the public housing stock to the municipal level... In the second stage, commencing in October 2001, the province and municipalities developed implementation plans for the transfer of the responsibility of administering other provincial and federal programs, including provincial and non-profit co-op housing. On May 1, 2002, the second and final stage of the social housing business transfer became effective, as the last of the province's social housing portfolio devolved to municipal control... According to Lynn M. MacDonald, Assistant Deputy Minister, Social Housing Business Division, the transfer was '...by far the largest and most complex intra-jurisdictional transfer in the province's history' " (Young and Best 2003: 3).

41 "It is outlined in the Common Sense Revolution that we would prefer to get out of the housing business and provide subsidies to those who need them rather than subsidize bricks and mortar." Al Leach, Minister of Municipal Affairs and Housing, Hansard Official Records for 7 May 1996. The move was also a trade-off that would allow the uploading of education from local school boards to the province, allowing the province to control education expenditures (Suttor 2016a).

42 The City had acquired these Victorian-era houses in 1974 from the developer Meridian, which had previously bought up most of the houses in the area, intending to demolish them and create more highrises to extend the St. James-town superblock which lies to the northwest. Residents and community activists opposed the plan and the developer's tactics in implementing it and after a protracted struggle, the City negotiated a settlement with the developer and took over 27 rooming houses that had not yet been demolished (see Freeman 2013: 152–157).

approval of the sale of 675 Toronto Community Housing properties containing 740 units. The sale of these “stand-alone” or “scattered-site” houses from the portfolio of publicly owned housing was intended to raise money to help with the maintenance backlog for other, larger TCH properties:

Based on TCH estimates, these 675 properties have a combined market value of at least \$222 million that can be put towards the approximately \$650 million needed for capital repairs (City of Toronto Shelter Support and Housing Administration 2012: 2).

The idea for selling off individual houses had originally come from Councillor Case Ootes, who had been appointed managing director of Toronto Community Housing in spring 2010, following the departure of the previous managers and board members over questions related to employee expenses. Mr. Ootes at first suggested selling *all* scattered-site housing in TCH's portfolio, or about 900 properties. This would have included the rooming houses.

A few properties were sold right away. As of early 2012, the report noted, “Council has [already] approved TCH's requests for consent to the sale of 47 stand-alone properties – 20 at below market value to another social housing provider and 27 on the open market” (2).

The proposal for 675 properties excluded 20 “rooming houses,” which were to be the subject of further analysis.⁴³ An earlier report to the TCH Board of Directors, cited in the 2012 report, had:

noted that TCH must undertake “a further review of the benefit and feasibility of selling these categories of assets given existing planning constraints and social impacts.” The report stated that, “in the case of the rooming houses, for example, the form of accommodation being provided for these tenants may be the most appropriate accommodation available in the city” (11).

The rooming houses listed in the appendix to the report were located throughout the city. A staff member at TCH explained that of the properties that were to be included in the review, several were SHOP [Single Housing Opportunity Program for people recovering from addiction] houses in which social service agencies leased out rooms (never more than six units) or houses that had two or more self-contained units. One was a building with self-contained units, and only two were among the TCH rooming houses in the Cabbagetown/St. Jamestown area.

The report also recommended deferring the sale of a further 18 properties that were managed by non-profit agencies as supportive housing.⁴⁴

It is recommended that Council not consent to the sale of these 18 properties...at this time and that Council refer them back to TCH for further analysis and consultation with the supportive housing agencies and their clients (2).

Strong opposition to the proposal came from Toronto Community Housing tenants and those on its long waiting lists, as well as housing advocates and community leaders, who had been preparing

43 An appendix lists two in Ward 13, one in Ward 19, five in Ward 27, one in Ward 28, five in Ward 30, four in Ward 32, one in Ward 40, and one in Ward 43.

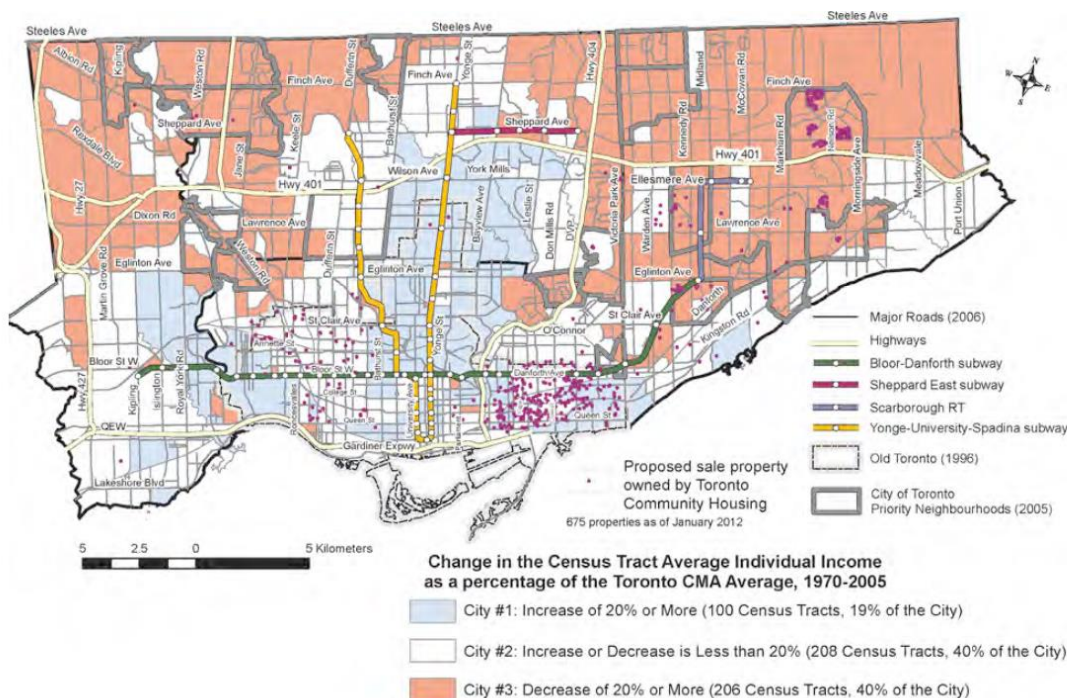
44 The original list had included at least three rooming houses run by the Homes First Society (Jarvis House, Northcote House, and Brandon House). On January 16, 2012, Homes First wrote to the City asking to have these three houses removed from the disposition list.

responses ever since Mr. Ootes first floated the idea.⁴⁵ The mayor pre-empted what was clearly going to be a contentious session:

Before any of the 117 people signed up to speak against the selloff had a chance, Mr. Ford announced that he was supporting an expert working group, to be headed by centrist councillor Ana Bailão, that will look for alternatives and report back in the fall. The committee did approve the sale of 56 vacant properties (Selley 2012).

During the summer of 2012, as the working group studied the issue, the Neighbourhood Change Research Partnership (NCRP) published its own response, in a brief titled “Anything But Scattered: The Proposed Sale of Toronto Community Housing’s Standalone Scattered-Site Housing and Implications for Building an Inclusive Toronto” (Walks 2012). The paper included a map showing the locations of the proposed sales, set within the context of the *Three Cities Within Toronto*, the NCRP analysis of the city by income trends: rising, stable, and falling, mapped by census tract (Hulchanski 2010).

Figure 10: Location of scattered site housing proposed for sale in 2012 (Walks 2012)



The paper concluded:

Selling these “scattered-site” units into the private market will likely exacerbate spatial polarization trends within the inner suburbs, as well as between the inner city and the inner suburbs. The neighbourhoods that will accrue private benefits are those that are already wealthy or are gentrifying (particularly those in the east end of the inner city – including

45 For example, the Wellesley Institute prepared a backgrounder called *Selling Off Affordable Homes is Bad for Toronto's Health: Seven Things You Need To Know* (Wellesley Institute 2011).

neighbourhoods where gentrification had previously been slowed by the presence of non-market affordable housing, including the units now proposed for sale).

The neighbourhoods that are least likely to benefit, and that may even be negatively affected, are those already suffering from social problems, crime, and declining incomes in the inner suburbs. If the standalone units are sold into the private market, rich neighbourhoods will become richer, and poor neighbourhoods will become poorer, and inequality – and the social tensions that it produces – will increase further. The gulf between City #1 and City #3 will widen (Walks 2012: 7).

The City's working group produced its report in September 2012.

The Special Housing Working Group recommends that Toronto Community Housing be permitted to sell 55 of its stand-alone properties which have a potential market value of more than \$600,000 or are vacant and in poor repair.... (1)

The 55 properties contain a total of 80 units of rental housing of which 49, or 61 percent, have RGI subsidies. Approximately three-quarters of the units were occupied at the end of August 2012. The properties are located in neighbourhoods in 12 Wards across the City. They include 40 single family houses, 12 duplexes and two houses with 5 units. There is one house which contains 6 units. There are two single-storey houses and 7 three-storey houses; the rest are all two or two and a half storey properties. They include a mix of detached, semi-detached and row houses (7).

City Council unanimously approved the proposal. A follow-up report from 2016 noted: "Of the 158⁴⁶ stand-alone houses approved for sale by City Council between 2010 and 2012, a total of 140 properties have now been sold and/or committed under contract generating roughly \$78 million in state of good repair funds" (Toronto Community Housing 2016: 2).

Still, the larger question of paying for maintenance and renewal of Toronto Community Housing properties (including the 20 rooming houses) remains. Mayor John Tory, elected in 2014, appointed another task force in 2015 to carry out research and consultation on a long-term strategy for the corporation. The task force report, released in January 2016, identified

buildings that might be managed, or owned and managed, by other non-profit organizations. These could include... rooming houses, scattered units, ownership housing and other properties that lie outside TCHC's core mandate (City of Toronto Mayor's Task Force on Toronto Community Housing 2016: 32).

In July 2016, City Council accepted the task force report and asked staff to develop an implementation plan "detailing the actions required to... transition a portion of the Toronto Community Housing Corporation portfolio to existing and interested community-based non-profit social housing providers" (City of Toronto Deputy City Manager 2016: 3). A strategy for rooming houses is due at the end of 2017 (City of Toronto 2017).

46 The figure of 158 is the sum of the 47 units sold before 2012, the 56 approved in February 2012, and the 55 added by the working group in September 2012.

13. Rooming houses as student accommodation in the suburbs

Students have long used rooming houses as affordable housing. Ward 20, around the St. George campus of the University of Toronto is second only to Parkdale's Ward 14 in the number of licensed rooming houses. Many have been there for decades.

However, rooming houses are not permitted in the areas around the growing suburban campuses of the University of Toronto at Scarborough and Seneca College in northern Scarborough, York University and Centennial College in North York, and Humber College in Etobicoke. As these post-secondary institutions expand and recruit students from far beyond the local community, there may not be residence rooms for all students coming from a distance. Some campuses, such as Centennial College in Scarborough, have no residences whatsoever. In other cases, students consider residences too expensive or too restrictive and look for housing elsewhere: York University closed one of its residences, Founders Hall, in 2011 because of a lack of occupants (Robson 2011b).

Students at suburban colleges and universities may commute from elsewhere in the city, or band together with other students to rent a house near campus. The latter arrangement is not the same as a rooming house, since it is a simple rental transaction for a complete property, even though the house may be carved up for multiple tenants, who may share kitchens and bathrooms.

A third option is to find a room in an "illegal" rooming house. Some property owners have converted houses in the suburbs which they run as rooming houses, advertising for tenants online or informally through the college and university communities. Since Scarborough and North York do not allow the licensing of rooming houses, and Etobicoke does not permit rooming houses beyond a very limited number of sites, these unlicensed or "illegal" rooming houses cannot be regulated or inspected by the city.

From the outside, it can be hard to tell the difference between a shared house and an illegal rooming house. In fact, some unlicensed rooming houses may blend in better with their neighbours, if their owners take responsibility for ensuring that grass is cut, garbage is removed, and the house exterior is well maintained. The tenants in these houses may be a mix of students and working or unemployed adults, and may not use the house for holding parties. Each unit is separate and doors can usually be locked.

Students sharing a house, however, may be less likely to carry out property maintenance, and more likely to host parties in the shared premises. Neighbours who are bothered by noise, garbage, or a surplus of parked cars may assume that these are rooming houses, but they are private

residences. A 2016 article in the *Toronto Star* quotes Mark Sraga, the city's director of investigation services in the licensing division. "A bunch of students living together and sharing a house does not make it necessarily a rooming house" (Powell 2016d).

Rooming houses in the suburbs can be and have been prosecuted by the city, generally on the basis of deliberate infractions of fire codes, zoning bylaws, or property standards requirements. In one case, a Scarborough property owner created an 18-bedroom rooming house on a residential street, New Forest Square. The owners, Lushan Lu and Zhuan Wang, were fined \$5,000 each in 2007 and forced to undo the interior changes they had made in converting the house. Around the same time, Run Ying Wang was fined \$72,000 for running six illegal rooming houses (Vincent 2008).

The 2011 murder of a student in the "Village" at York University exposed some of the dangers of these unregulated houses.

The subdivision was built less than a decade ago; most of the homes originally had three or four bedrooms and were intended for families. But many have been roughly subdivided into rooming houses with space for dozens of tenants — little rabbit warrens with enough space for a bed, a desk and perhaps a kitchenette tucked into a closet.

This neighbourhood is where Qian Liu, a 23-year-old York student from China, was found dead in the basement apartment of a suspected rooming house. Brian Dickson, 29, is charged with first-degree murder. He was renting a room on the main floor and would have had direct access to Liu's suite by using the home's original staircase, according to people who visited the home...

Now residents are questioning the safety of letting people rent rooms for as little as \$30 a night. Some, like Dickson, are not students (Robson 2011b).

This is an extreme case, but it raises questions surrounding informal student housing.

In 2013, the city prosecuted and fined Meera Mahendran and Yixuan Wang \$10,000 each as the owner and manager, respectively, of an unlicensed rooming house on Military Trail near UTSC, where 11 students were accommodated. Wang had herself been a student at UTSC and had lived in a similar arrangement at that time; she claimed she had no idea she was doing something illegal (Harvey 2014).

As suburban campuses expand, the problem of finding affordable student housing near campus gets worse. The shortage of student housing has come to dominate many discussions of rooming houses, and the city's second attempt to regulate rooming houses focused heavily on the areas around university and college campuses.

14. A second attempt to harmonize bylaws and licensing, 2013–present

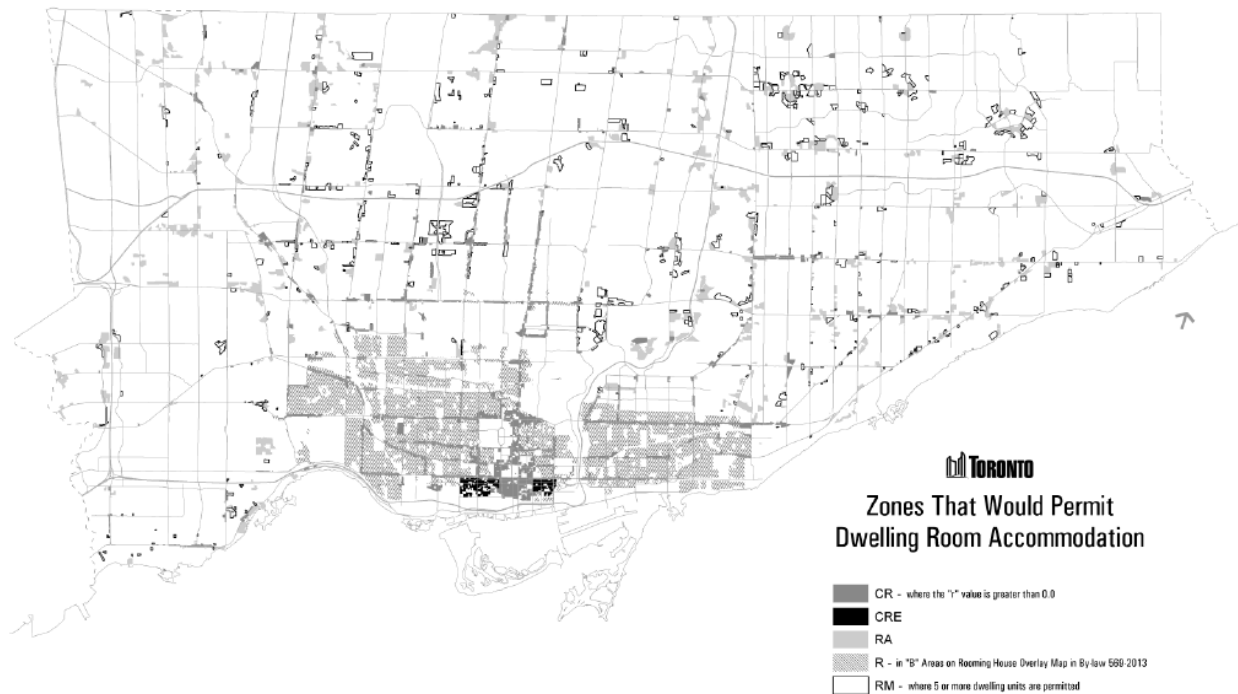
A City Planning report completed on September 30, 2013, proposed a “Framework for Considering City-wide Zoning By-law Regulations for Dwelling Room Accommodation.” It contained two recommendations:

1. The Chief Planner and Executive Director, City Planning Division, together with the Executive Director, Municipal Licensing and Standards, arrange public meetings in each of the District Centres to discuss the proposed City-wide zoning and licensing regulations for introducing dwelling room accommodation in Residential Multiple (RM) zones where five or more units are permitted, Residential Apartment (RA) zones, Residential Apartment Commercial (RAC) zones, Commercial Residential (CR) zones where the “r” value is greater than 0.0, and Commercial Residential Employment (CRE) zones in accordance with the regulations described in this report.
2. The Chief Planner and Executive Director, City Planning Division, and the Executive Director of Municipal Licensing and Standards report following the public meetings and consultation with other Divisions and key stakeholders on the draft zoning by-law and licensing by-law changes.

A map accompanying the report (see Figure 11) indicated the location of the zones proposed for rooming houses. Once again, the city excluded rooming houses from residential districts other than those in which houses or apartments with multiple units were already permitted.

A comparison of this map and the one attached to the 2009 report (see Figure 6) shows many similarities (although the two maps are not identical). The “outdated” rooming house overlay of sites in Etobicoke (many of them unavailable as residential sites of *any* kind) has been retained. Most zones in which rooming houses would be permitted are on or near major streets. The difference between the old City of the Toronto and the other former cities is still stark.

Figure 11: 2013 proposal to license rooming houses across the City of Toronto



The report, which was also quite similar to the 2009 version, ended with the paradoxical comment:

The framework concept of zoning and licensing regulations is intended to **ensure consistency** and effectiveness of both implementation and enforcement of dwelling room accommodation. At the same time, the framework approach allows for the various areas where this use would be permitted to have **key provisions modified to address local concerns**. [emphasis added]

In other words, consistency but with an allowance for local inconsistency.

On October 22, 2013, the City's Planning and Growth Management Committee considered the September 30 report and asked for further study and consultation. The Committee:

1. Directed that, prior to any further consideration of extending the legalization of rooming houses, the Executive Director, Municipal Licensing and Standards provide evidence that an effective strategy exists for the enforcement of illegal rooming houses.
2. Requested the Chief Planner and Executive Director, City Planning to revisit the plans for community consultation in rooming houses to create real opportunities for discussion and dialogue.

Ten months later, on August 6, 2014, City Planning produced a new report. It began with a note of urgency, albeit expressed in bureaucratic jargon: "The challenges inherent to the current regime have been evidenced by a number of incidents, primarily fire-related, where injuries and fatalities

have occurred.” Indeed, there had been at least four fires and three deaths in rooming houses during those 10 months.⁴⁷

The report also spelled out the perennial conundrum that the City faced if it were to propose rigorous bylaw enforcement:

Where rooming houses are not permitted, ML&S'[s] only enforcement option is to cease the operation of the rooming house...

This approach of ceasing illegal rooming house operations may...result in the de-housing of residents. De-housing creates an emergency situation for the residents and often requires significant support from various City divisions and agencies that provide programs to assist residents...

Ultimately, enforcement efforts resulting in de-housing may drive the rooming house market further underground, as occupants are less likely to report concerns for fear of being displaced. This leads to poorer conditions at rooming houses where inspectors are either unaware of concerns, or where occupants will not permit entry for inspection. Not being able to access these residences impacts life safety for the occupants and affects community safety as a whole.

Ultimately, the report recommended a four-phase program of study and consultation, which was expected to wrap up in December 2015.

Early in 2015, the City commissioned an organization called Public Interest to design and implement a consultation strategy in spring 2015. The resulting report, published in June 2015, noted that this strategy included:

- 14 neighbourhood consultations,
- 7 tenant focus groups,
- consultations with Toronto's post-secondary institutions, housing support workers, and immigrant settlement agencies,
- 2 key informant interviews with owners/ operators of rooming houses,
- a confidential online survey for stakeholders and other interested parties to provide feedback.

In the space of a few months, 559 people participated in the neighbourhood consultations and 742 people made comments through the online survey. In addition, 127 tenants and other stakeholders attended the focus groups and other meetings. More than 60% of those who attended neighbourhood meetings (352 people) were from Scarborough.

The consultants confirmed general support for citywide licensing:

47 October 8, 2013, 244 Gladstone Avenue (nr. Dundas), Ward 18, no fatalities; November 20, 2013, 189 Sheridan Avenue (Brockton), Ward 18, 1 fatality; February 14, 2014, 235 Jarvis St. at Dundas, Ward 27, no fatalities; March 20, 2014, 6 Andrews Avenue (near Kensington Market), Ward 19, 2 fatalities.

While some participants vocally disagreed, most favoured the application of a single unified licensing bylaw and standards that were mandatory across the city, because this would allow better enforcement of standards.







The “vocal disagreement” came, for the most part, from residents in the east end of the City:

Scarborough neighbourhood consultations had by far the highest turnout and expressed the strongest level of concern about rooming houses. While the documented feedback from those meetings showed significant support for licensing and regulation of rooming houses, Scarborough also had the highest numbers of neighbourhood consultation participants calling for an outright ban on rooming houses, which was often vocalized during the comments discussion groups provided in the group report back section of the consultation.

The consultants’ report conveyed the feedback received, including comments received through the online survey, which attracted a range of respondents, including tenants, owner/operators, service providers, people living near rooming houses, and other interested individuals (see Figure 12).

Figure 12: Participants in 2015 rooming house consultations

Please select all responses that apply to you.

Response	Chart	Percentage	Count
I live in a rooming housing.		14.8%	110
I live near a rooming house.		31.4%	233
I own or operate a rooming house.		2.7%	20
I provide services to people who live in rooming houses.		20.2%	150
I live in Toronto in and am interested in rooming house issues.		40.2%	298
None of the above.		10.6%	79
Total Responses			742

A few responses are of interest. For example, the confidential survey elicited responses from tenants of unlicensed or “illegal” rooming houses, who are seldom represented in such consultations.

About half of the rooming house tenants who responded didn’t know whether their particular rooming house was licensed or not.

Figure 13: Awareness of licensing among participants in 2015 rooming house consultations

Is the rooming house you live in licensed or unlicensed?

Response	Chart	Percentage	Count
It is licensed.		13.1%	13
It is unlicensed.		31.3%	31
I don't know.		53.5%	53
I don't want to answer this question.		2.0%	2
Total Responses			99

The message is that tenants who need affordable housing in a certain area do not know (and don't necessarily care) whether the housing they occupy meets municipal requirements. Those who urgently need a roof over their heads tend not to question the legality of that roof. Why should they? Why should the onus be on prospective tenants of low-rent housing to carry out the due diligence required to determine if the affordable accommodations on offer are (a) legal and (b) fully in line with applicable municipal bylaws?⁴⁸

More than half of the overall respondents admitted that they didn't know much about licensing.

Figure 14: Knowledge of licensing rules among participants in 2015 rooming house consultations**ATTITUDES ABOUT LICENSING AND REGULATION**

How familiar are you with the City or Toronto's existing rooming house licensing rules?




Response	Chart	Percentage	Count
Familiar		33.1%	234
Unfamiliar		58.5%	413
I don't know.		8.4%	59
Total Responses			706

Nevertheless, many of them wanted to see the rules changed.

48 As a former rooming house tenant myself in 1970s, it never occurred to me to inquire whether my Halifax rooming house met applicable bylaws. Nor would I have known what to do or whom I should have approached if I had found that they did not meet the requirements of those bylaws.

Figure 15: Opinions of rooming house rules among participants in 2015 rooming house consultations






How well do the City's existing licensing rules and enforcement systems for rooming houses work?

Response	Chart	Percentage	Count
They work well.		2.2%	15
They need to be changed.		54.9%	379
I don't know.		42.9%	296
Total Responses			690

And more than half of those who responded to a question about where licensing should apply felt that licensing was needed in “all areas of the City.”

Figure 16: Opinions on where rooming houses should be licensed for participants in 2015 rooming house consultations

In 1998, six smaller cities joined to become the current City of Toronto, some retaining their previous legislation. As a result, rooming houses are only permitted in the former cities of York, Toronto and Etobicoke. Rooming houses that operate in Toronto and Etobicoke must be licensed. Where do you think Toronto should have licensed rooming houses?

Response	Chart	Percentage	Count
Fewer areas of the City.		16.0%	110
The same areas we have now.		9.9%	68
More areas of the City.		10.2%	70
All areas of the City.		53.6%	368
I don't know.		10.3%	71
Total Responses			687

The consultants did not comment on the statistical significance of the survey, which may not be representative of the opinions of all Toronto residents, but the results are nonetheless interesting and suggest that opposition to rooming houses may be confined to a minority, albeit a vocal minority.

An interesting commentary on the consultations appeared in a blog called “Opening the Window” by Joy Connelly, a consultant with many years of experience in social housing. Connelly wrote:

According to the City's *Rooming House Review: Public Consultations*, many Torontonians are seeking a more rigorous rooming house licensing regime, with more inspections, tougher penalties and greater opportunities for neighbours to complain. The implicit aim: to rid the City of bad rooming houses...

It is clear that the current rooming house licensing regime is not working. But before we rush to fix the system with more inspectors with more enforcement powers – the usual responses – should we not ask the question, “Why license at all?”

We don't license other rental housing. We don't license privately owned and occupied homes. Perhaps we should first ask, "What makes this housing distinctive? And are there better ways to respond to these distinctions?"

- Is it that rooming house tenants are often vulnerable? Surely the solution is making their homes more secure with increased supports – not making tenants' lives more precarious with the threat of shutting down their homes.
- Is it that rooming house tenants are afraid to complain? Then focus energies on helping them exercise their rights at the Landlord Tenant Board – the body already designated to protect their interests.
- Does the City simply need to know where rooming houses are? Then maybe what's needed is a registry, not a license (Connelly 2015a).

These are sensible questions, but the consultations treated rooming houses as a "problem" in need of "solutions." So it is not surprising that most participants did not consider alternative approaches and generally offered "solutions" from "ban them all" to "license them all," without considering whether there were any intermediate approaches.

Following the consultation, City staff continued to study rooming houses, and over the summer employed a planning student to begin the process of reviewing practices in other Canadian and U.S. cities. The jurisdictional scan, as published in the resulting report, covered the following 15 cities:

Barrie	Hamilton	Vancouver
Brampton	London	Waterloo
Calgary	Mississauga	Winnipeg
Edmonton	Oshawa	Chicago
Guelph	Ottawa	Seattle

It is not clear why Quebec and the Atlantic Provinces, as well as Northern Ontario, were not included, since cities such as Montréal, Halifax, and Thunder Bay have long experience with rooming houses.

The report "Proposed Regulatory and Licensing Strategy for Multi-Tenant Houses & Consultation Plan" appeared in October 2016. It proposed a new name for rooming houses ("multi-tenant houses") and two definitions:

Dwelling Room – means a room provided, for a fee or other consideration, for living accommodation and which may contain private sanitary facilities but not cooking facilities. ...

Multi-Tenant House – means a building containing more than three (3) dwelling rooms that may have private sanitary facilities or shared common facilities for sanitary and cooking.⁴⁹

The report essentially called for...more consultation. There was a single recommendation:

49 Both definitions excluded rooms in "An Apartment Building, Hotel, Crisis Care Shelter, Municipal Shelter, Nursing Home, Residential Care Home, Retirement Home, Seniors Community House, Student Residence, or Tourist Home."

[That] Executive Committee direct the Executive Director, Municipal Licensing and Standards and Chief Planner and Executive Director, City Planning to conduct public consultation on the proposed regulatory and licensing strategy and its potential impact on tenants, owners and the surrounding community and report back to Executive Committee in 2017.

As Joy Connelly summed it up on her blog:

It's a thoughtfully-written document, but a cautious one, recommending another full year of consultations – this after a comprehensive research and consultation program that began in 2014 ... – simply to introduce a pilot project (Connelly 2016).

In fact, the report proposed five pilot projects in five areas of the city, all of them associated with the campuses of postsecondary institutions and all with sizable student populations:

1. Ward 1: Humber North Campus
2. Ward 8: York University; Seneca York Campus
3. Ward 33: Seneca College Newnham Campus
4. Wards 39, 40, and 41: a large area in Scarborough with access to University of Toronto at Scarborough, Centennial, Seneca, and Lambton College campuses
5. Wards 43 and 44: University of Toronto at Scarborough; Centennial College Morningside Campus

According to the report, “Consultation would enable staff to seek input on the proposed area boundaries, use definitions, and maximum threshold (number of rooms in each multi-tenant house) and report back to Council with recommended temporary use by-laws for each of the five areas in 2017.” In other words, neighbours and local councillors were to help determine how many low-income tenants they would accept and under what conditions.

The Advocacy Centre for Tenants Ontario welcomed the progress made by the city, but deplored the further delay involved:

The proposed consultation process and further report will, at best, result in a temporary solution for part of the City. We recognize that everything cannot be done at once. But permitting the staff to take six months to plan, co-ordinate and prepare for collecting further public feedback on a temporary solution for five communities is not acceptable. The report before you is the result of a two-year consultation process. The most significant issues proposed for further consultation have already been thoroughly canvassed. Another nine months is not required to determine that there are a wide range of views on these questions (Advocacy Centre for Tenants Ontario 2016: 1).

A City of Toronto staff member explained to me that the purpose of the pilot projects was to help people get used to the idea of rooming houses and to prove that rooming houses can work in residential neighbourhoods. But there is one potential challenge: successful rooming houses do not call attention to themselves, so it is difficult to demonstrate “success.” As Mariana Valverde commented when a building for people with mental illness opened near her home:

Since the building opened to house mentally ill tenants, in the summer of 2006, nothing of any note has happened. The absence of crime and disorder, however, has gone unnoticed and unpublicized—it was the dog that didn't bark in the night. Thus, those who fought bitter-

ly against the supportive-housing development have not had an opportunity to learn from experience and realize that their fears were unwarranted (Valverde 2012: 133).

Overall, the City report proposed “A uniform licensing bylaw for the whole city,” but recommended additional requirements, such as a zoning review, a property maintenance plan, site or floor plans, a waste management plan, a parking plan, applicable building permits to be cleared, and written confirmation of the maximum number of lodgers to be accommodated. (It is interesting to compare these requirements with those for apartment buildings.) The report also called for greater transparency in licensing, including renewals (that is, even greater public scrutiny of these proceedings), incentives (to operators to encourage licensing), and better “public awareness.”

In other words, a uniform bylaw, but a more detailed and more complicated one, entailing more oversight. The word “transparency” suggests a greater opportunity for neighbours to accept or reject low-income tenants in their neighbourhoods. The question of human rights was not raised. As of 2017, that question still hangs over the rooming house sector.

15. The view from 2018

Twenty-four years ago, I wrote a policy history of rooming houses in the (former) City of Toronto. I used as an epigraph something that Michael Shapcott had quoted during an interview: “The most radical thing is a long memory.” He said it was had heard it somewhere, but couldn’t remember where. And at the time, there was no Google to check. Now I know that it is a quotation from labour organizer, storyteller, and musician Bruce “Utah” Phillips (1935–2008), who said,

The long memory is the most radical idea in the country. It is the loss of that long memory which deprives our people of that connective flow of thoughts and events that clarifies our vision, not of where we’re going but where we want to go.⁵⁰

Many of those I interviewed for that 1994 document came of age in the 1960s and formed their ideas of social justice in that period. And they have long memories. Today, many of them are retired or nearing retirement. The roomers and homeless people that they try to help are aging, too. Bob Duff of St. Simon’s Men’s Shelter told Joe Fiorito of the *Toronto Star*:

“The age of the guys on the street is going up. We have regulars, six of them, who are in their 70s. The average age of our men is 61. The tidal wave is coming.” He paused. I looked up. “We’re having to buy adult diapers.” (Fiorito 2016)

The major events and policies affecting rooming houses over the past 20 years are summarized in Table 5 at the end of this chapter. But behind those events and policies are larger trends. The pace of redevelopment in the downtown core (and the soaring value of downtown land) threatens older buildings that serve as rooming houses. Many have already been demolished over the past 20 years, and more demolitions are on the horizon; rental housing protection acts do not apply to rooming houses.⁵¹ Meanwhile, the conversion of rooming houses to boutique hotels in the downtown core has erased many of the establishments where roomers once lived. Other changes include the rise in short-term rentals of single rooms, made possible by the Internet.

The geography of poverty is also changing, as *The Three Cities Within Toronto* (Hulchanski 2010) has shown. Poverty is no longer concentrated downtown, but is now associated with the “inner

⁵⁰ Retrieved from <https://www.thelongmemory.com/>

⁵¹ As Councillor Mike Layton noted in a letter to the Affordable Housing Committee dated August 31, 2015, “Because the City’s Official Plan policies and Chapter 667 of the Municipal Code (under S.111 of the City of Toronto Act) protect dwelling units, not dwelling rooms, these properties [large single-room occupancy buildings] may be increasingly attractive to developers believing that no rental replacement will be required, and little or no tenant relocation assistance provided” (Layton 2015).

suburbs” that were developed in the 1960s and 1970s. “Underlying causes include, Hulchanski says, deliberate tax and social policy changes that redistributed income upward, the disappearance of well-paid, unionized manufacturing jobs, rising housing costs and racial discrimination” (Rider 2014).

The amalgamation of the City of Toronto in 1998 stitched together six cities that had different by-laws, policies, and political cultures. Many of these differences remain. Even though poverty is widespread in the suburbs, three former suburban municipalities (which persist as “ghost jurisdictions”) do not permit – or even acknowledge – rooming houses, so the ones that operate there cannot be counted or inspected. And rooming houses in the suburbs do not resemble rooming houses in the downtown core. Most pass unnoticed on residential streets. This invisibility has the advantage of according the residents anonymity (rather than the intense scrutiny to which downtown rooming house tenants are subjected), but may also leave them vulnerable to health and safety hazards or unscrupulous landlords.

The City of Toronto has attempted, as yet unsuccessfully, to extend rooming house regulation to all parts of the City, which is fair and consistent with human rights, but the “excessive administrative attention” (Freeman 2013: 263) accorded to rooming houses tends to leave roomers at the mercy of their neighbours in the current licensing system. The proposed pilot projects were the subject of yet more “community consultations” in June 2017. As Mariana Valverde notes: “‘community consultations’ tend to empower the already empowered, and actively disempower those in need of housing who are not yet living in the neighborhood in question” (Valverde 2012: 138).

Following this second round of consultations, the City of Toronto has taken no further action, and the report that was to have been presented to Council in the first quarter of 2018 has yet to appear. Since a municipal election is scheduled for fall 2018, it is unlikely that any decisions will be taken in the meantime.⁵²

In any case, the community consultations, which tended to attract far more opponents of rooming houses than supporters, did not reveal any consensus on the issue. The summary report of this second round of consultations noted: “Most participants in the public meetings opposed any zoning changes to allow MTH [multi-tenant housing] in their neighbourhoods” (Public Interest Strategy and Communications 2017: 5).

An attendee at a special town hall meeting on rooming houses held in Ward 41 (Scarborough–Rouge River) in late September 2017 noted that of the 50 participants, nearly all opposed rooming houses, despite Councillor Chin Lee’s opening remarks to the effect that the city needs affordable housing and housing is a human right. During the question-and-answer session, the questions and comments focused on parking, garbage, landlord profiteering, and “just don’t want rooming houses in a family neighbourhood.”⁵³

That the consultations did not elicit much support for rooming houses should not come as a surprise. In this, as in all consultations, participants repeatedly stated that allowing rooming houses

52 Councillor Mike Layton’s 2015 request that the Affordable Housing Committee look into measures to preserve the stock of large single-room occupancy buildings has also apparently languished without follow-up.

53 Personal communication from Joy Connelly, who attended the meeting, September 29, 2017.

would disturb the prevailing neighbourhood “character.”⁵⁴ Valverde has suggested that instead of focusing planning for housing on “the character of the neighborhood,” an approach that reinforces middle-class norms and single-family households at the expense of housing for unrelated adults,

we might need to start talking about “the character of the city”... in cities that have become highly diverse, socioeconomically as well as ethnically, maintaining and supporting that diversity... is a goal that can arguably be seen as falling squarely within the objectives and customary practices of land-use law, if planning and planning-related decisions took the city as a whole as its object and goal, not just “the subject property” and the micro-local area (Valverde 2012: 140).

Rooming houses tend to be seen in the “micro-local” or neighbourhood context, not in the context of the city as a whole. Taking the wider view suggests that this approach is short-sighted. For example, a 2017 study by the Canadian Centre for Economic Analysis (CANCEA) suggests that the long-held view of suburban areas as primarily “family neighbourhoods” is belied by data showing that many of Toronto’s neighbourhoods are losing population (Dingman 2018). As one commentary on the study put it:

These neighbourhoods look much as they have for the past few decades. But instead of houses full of children, many houses have only one or two occupants. The result: despite an acute affordable housing shortage Toronto has over 2 million spare bedrooms... These neighbourhoods were designed for the typical families of the 1960s, when the average household size was 3.9 people. By 2016, the average household size in Ontario was 2.6 people, and 58.7% of households were one- or two-person households (Connelly 2018).

Of course, those two million empty bedrooms cannot and will not be made available to those needing affordable housing, let alone opened up to potential roomers. But the research highlights the way in which Toronto’s commitment to limiting change in established residential neighbourhoods⁵⁵ is at odds with the urgent need to create affordable housing of all kinds in all parts of the city.

As of 2018, rooming houses remain the only area in which the City of Toronto has failed to harmonize zoning bylaws and regulations across the city, more than 20 years after amalgamation. The City has studied the problem exhaustively, carried out extensive public consultations in 2015 and again in 2017, produced numerous interim reports, and yet still cannot reach agreement on the issue, mainly because of strongly held opposition from some neighbourhoods where rooming houses are not officially recognized (although they are nonetheless present). Councillors

54 “A large number of attendees expressed outright opposition to zoning permissions for Multi-Tenant Houses in the area, indicating it would change the character of the neighbourhood” [University of Scarborough campus consultation]. “Many attendees spoke out following the presentation in outright opposition to the proposed zoning, citing potential change to the character of the neighbourhood” [Don Mills consultation]. “Participants feel allowing MTH in the area would negatively affect the character of the neighbourhood by increasing disruptive activities” [consultation at Stephen Leacock Community Centre in Scarborough] (Public Interest Strategy and Communications 2017: 71, 75, 77).

55 For example, the current Toronto Official Plan contains policies such as the following: “Development in established Neighbourhoods will respect and reinforce the existing physical character of the neighbourhood... No changes will be made through rezoning, minor variance, consent or other public action that are out of keeping with the physical character of the neighbourhood. The prevailing building type will be the predominant form of development in the neighbourhood” (City of Toronto 2015: 4-4). This type of policy has given rise to calls from housing advocates to loosen up zoning that prevents the creation of anything other than single-household detached dwellings in 20,000 hectares of the city – an area that represents 31 percent of the city’s land area and 62 percent of all residential land and has been dubbed the “Yellow Belt” because it appears as yellow on the city’s zoning maps (De Silva 2017).

representing those neighbourhoods are reluctant to vote for any measure that would sanction existing rooming houses and allow additional rooming houses, because of the fear of backlash from their constituents.

Rooming houses represent a potential citywide resource for low-income people in need of affordable housing. If micro-local concerns continue to outweigh citywide concerns, it will be difficult to make progress in improving the lives of low-income tenants.

Table 5: Rooming house timeline

1997	Tenant Protection Act comes into effect
	September 30: Linda Houston, a homeless woman, dies in North York on the evening of the day that Mel Lastman announces that there are no homeless people in North York
1998	January 1: Official amalgamation of the City of Toronto
	Mayor's Action Task Force on Homelessness established
	Toronto Disaster Relief Committee formed, releases Disaster Declaration
	Tent City starts to form on vacant waterfront land
	Study of the health of rooming house tenants led by Stephen Hwang
1999	Mayor's Task Force report released: <i>Taking Responsibility for Homelessness</i>
	Second suites legalized throughout the City of Toronto
	Parkdale Pilot Project launched
	Cityhome and Metro Toronto Housing Company merge to form Toronto Housing Company
2000	First Toronto report card on homelessness
	<i>Social Housing Reform Act</i> downloads social housing to municipalities
2001	Gladstone Hotel closes for renovations; reopens as boutique hotel in 2004; Drake Hotel closes for renovations; reopens as boutique hotel in 2005
	Second Toronto report card on homelessness
	Extreme heat alert program instituted
2002	Toronto Community Housing formed from merger of Toronto Housing Co. and Metro Toronto Housing Corp.
2003	Third and final Toronto report card on housing and homelessness
	Ontario Regulation 282/98 amended to include rooming houses in residential class for property tax purposes
2004	<i>City of Toronto Rooming House Issues</i> report published
2007	Advisory Committee on Homeless and Socially Isolated Persons disbanded
	Bylaw 885-2007 regulates the demolition of rental housing in Toronto (does not apply to rooming houses)
	Residential Tenancies Act comes into effect
2008	<i>Shared Accommodation in Toronto</i> report published
2009	<i>Toronto Housing Charter</i> released
	Toronto Affordable Housing Action Plan, <i>Housing Opportunities Toronto</i> , released
	City report on rooming house zoning brought forward, debated, and deferred
	"Harmonized" zoning bylaw introduced; does not permit rooming houses in North York, Scarborough, or East York.
2010	Advocacy Centre for Tenants Ontario (ACTO) appeals zoning bylaw to the Ontario Municipal Board
2011	"Harmonized" zoning bylaw repealed
2012	Residential Rehabilitation Assistance Program ends
	Toronto Community Housing scattered-site units proposed for sale; working group assigned to study the issue
2013	New "harmonized" zoning bylaw established; rooming houses excluded because of ongoing appeal
	City Planning proposes a framework for zoning rooming houses
2014	Parkdale Neighbourhood Land Trust incorporated
2015	Toronto Renovates program established
	Eviction of tenants of Queen's Hotel (now the Roncey hotel and event space)
	Public consultations on rooming house framework held
2016	Proposed rooming house strategy, including pilot project, submitted to City Council
2017	Rooming House report from Parkdale Neighbourhood Land Trust published
	Consultations on proposed pilot project for rooming houses held

16. References

- Advocacy Centre for Tenants Ontario. 2011. "Protection of Rental Housing." Retrieved from <https://www.acto.ca/en/law-reform-advocacy/archives/protection-of-rental-housing.html>.
- 2016, October 26. "Submission to the Executive Committee of the City of Toronto Regarding Proposed Regulatory and Licensing Strategy for Multi-tenant Houses & Consultation Plan."
- Bardach, Eugene, and Robert Kagan. 1982. *Going by the Book: The Problem of Regulatory Unreasonableness*. Philadelphia: Temple University Press.
- Barna, Miriam. 2007. "Bridging Divides: An Examination of the 1998 Parkdale Conflict Resolution Process." Master's paper. University of Toronto.
- Baute, Nicole. 2008. "Helping the at-risk stay cool." *Toronto Star* (July 18).
- Campsie, Philippa. 1994. *A Brief History of Rooming Houses in Toronto, 1972–1994*. Toronto: Rupert Community Residential Services of Toronto Inc.
- 1995. *Perception vs. Reality in the World of Rooming Houses: A Report for Rupert Community Residential Services, Inc.* Toronto: Rupert Community Residential Services, Inc.
- 1996. *Housing, Low-Income Tenants, and the Commonsense Revolution: The First Twelve Months*. Toronto: Rupert Community Residential Services, Inc.
- Canada Mortgage and Housing Corporation. 2009. "Affordable Housing." *Canadian Housing Observer*, Chapter 2.
- Canadian Centre for Economic Analysis. 2017. *Understanding the Forces Driving the Shelter Affordability Issue: A Linked-Path Assessment of Housing Market Dynamics in Ontario and the GTHA*. Toronto: CANCEA.
- Canadian Urban Institute. 2008. *Apartment Licensing in Toronto: A Solution in Search of a Problem?* Report prepared for the Greater Toronto Apartments Association. Toronto.
- Caton, Hillary. 2015. "City looks to Parkdale as example for functioning rooming houses." *Parkdale Villager* (February 27).
- CBC News. 2015. "Queen's Hotel tenants say they're being ousted on short notice." (August 7).
- Centre for Equality Rights in Accommodation. 2000. *Early Intervention Pilot Project: Final Report*. Toronto: CERA.
- City of Toronto. 2000. *Report Card on Homelessness*. Toronto.
- 2001. *Toronto Report Card on Homelessness 2001*. Toronto.
- 2003a. *Building on Successes: The Community Plan for the Supporting Communities Partnership Initiative (SCPI) in Toronto, 2003–2006*. Toronto.
- 2003b. *Report Card on Housing and Homelessness*. Toronto.
- 2004. *Mayor's Affordable Housing Summit: Summit Highlights*. Toronto.
- 2009a. *Housing Opportunities Toronto: An Affordable Housing Action Plan 2010–2020*. Toronto.
- 2009b. "Toronto Housing Charter: Opportunity for all." Toronto.
- 2012. *Heat Registries: A Guide for Helping Vulnerable People During Extreme Heat*. Toronto.
- 2013. *Street Needs Assessment Results*. Toronto.

- 2014, June 16. Expanded gaming at Woodbine Racetrack. Toronto: Acting City Manager.
- 2015. *Toronto Official Plan*.
- 2016, October 12. Proposed regulatory and licensing strategy for multi-tenant houses & consultation plan. Municipal Licensing and Standards; City Planning.
- 2017. Tenants First Phase One Implementation Plan; Executive Committee, June 19; City Council, July 4.
- City of Toronto Affordable Housing Committee. 2006. Minutes of the Affordable Housing Committee, Meeting 5, Thursday, July 13, 2006.
- 2008, June 16. Housing Opportunities Toronto: Affordable Housing Framework 2008–2018. Toronto: AH7.4.
- 2012, September 24. Final report of the special housing working group and sale of select Toronto community housing stand-alone properties. Toronto.
- City of Toronto Affordable Housing Office. 2015. 2015 Toronto Renovates program: Repair and renovation funding for rooming houses and similar accommodations with single room occupancy. Toronto.
- City of Toronto City Clerk. 2002, September 25. Renewed terms of reference and membership for the Advisory Committee on Homeless and Socially Isolated Persons. Toronto.
- City of Toronto City Manager. 2015, June 16. *Expanded Gaming at Woodbine Racetrack*. Toronto: EX7.4.
- City of Toronto City Planning. 2006, June 12. Regulating the maximum occupancy of rooming houses located in residential zones. Toronto.
- 2007. Implementing by-law for s.111 of City of Toronto Act: rental housing protection. Toronto.
- 2008, October 28. Extending zoning and licensing of rooming houses. Toronto.
- 2009a, January 8. Extending zoning and licensing of rooming houses. Toronto: PG22.5.
- 2009b, December 14. Approach for proposed zoning regulations for rooming houses. Toronto.
- 2010, January 6. Approach for proposed zoning regulations for rooming houses. Toronto.
- 2013, September 31. Framework for considering city-wide zoning by-law regulations for dwelling room accommodation. Toronto.
- City of Toronto Community Planning. 2015, April 9. 175-191 Dundas Street East and 235 Jarvis Street zoning amendment application: Request for direction report. Toronto.
- City of Toronto Deputy City Manager. 2016, June 14. Tenants First: A way forward for Toronto community housing and social housing in Toronto. Toronto.
- City of Toronto Mayor's Report. 2007, January 29. Advisory Bodies and Working Committees.
- City of Toronto Mayor's Task Force on Toronto Community Housing. 2016, January 26. *Transformative Change for TCHC*. Toronto: City of Toronto.
- City of Toronto Municipal Licensing and Standards. 2007, March 6. *Multi-residential Apartment Buildings Regulatory Strategy*. Toronto.
- 2008, October 27. Regulatory Strategy for Multi-Residential Apartment Buildings (MRABs). Toronto.
- 2014, June 26. Multi-Residential Apartment Buildings (MRAB) audit and enforcement program: Updated Annual Report. Toronto: Committee Decision Report.
- 2016a, May 3. Multi-Residential Apartment Buildings (MRAB) audit and enforcement program: 2015 Annual Report. Toronto.
- 2016b, November 16. Rental apartment buildings: Results of public consultation and proposed regulatory regime. Toronto.
- City of Toronto Municipal Licensing and Standards and City Planning. 2016. *Proposed regulatory and licensing strategy for multi-tenant houses & consultation plan*. Toronto: EX18.13.
- City of Toronto Public Health. 2008, February 14. *Bed Bug Issues in Toronto*.
- City of Toronto Shelter Support and Housing Administration. 2012, January 10. Securing funding to repair Toronto community housing's multi-residential portfolio: Sale of Toronto community housing stand-alone units. Toronto.

- n.d. “Rent Bank.” Retrieved February 11, 2017, from: <http://www1.Toronto.ca/wps/portal/contentonly?vgnextoid=55acb3d3db7a2510VgnVCM10000071d60f89RCRD>.
- City of Toronto Urban Development Services. 1997. *Ward 2 Neighbourhood Revitalization: Draft for Discussion*. Toronto: City of Toronto.
- City of Toronto, Toronto Community Council. 1999, October 22. *Parkdale Conflict Resolution Process (Ward 19 - High Park)*.
- City of Vancouver. 2015. “Single Room Accommodation By-law No. 8733.”
- CMHC. 2000. *Regulatory Factors in the Retention and Expansion of Rooming House Stock: Final Report*. Ottawa: CMHC.
- 2002. *Initiatives to Maintain Rooming House /Single Room Occupancy Stock and Stabilize Tenancies*. Ottawa: CMHC.
- 2006. *Profile of Rooming House Residents*. Ottawa: CMHC.
- Connelly, Joy. 2015a. “Rooming houses for a more affordable Toronto.” Opening the Window blog. Retrieved from <https://openingthewindow.com/2015/09/17/rooming-houses-for-a-more-affordable-Toronto/>
- 2015b. *When Hotels are Homes: Lessons from the Broadview Hotel Relocations*. Prepared for Woodgreen Community Services. Toronto.
- 2016. “A rooming house policy that puts tenants first.” Opening the Window blog. Retrieved from <https://openingthewindow.com/2016/10/25/a-rooming-house-policy-that-puts-tenants-first/>
- 2018. “Preserving family values in the Yellow Belt.” Opening the Window blog. Retrieved from <https://openingthewindow.com/2018/03/22/preserving-family-values-in-the-yellow-belt/>
- d’Abramo, Joe. 2013. “The art of transition: Toronto comprehensive zoning by-law.” *Ontario Planning Journal* 28 (2): 7.
- DeMara, Bruce, and Jack Lakey. 1997. “Lastman says no homeless in North York: Comments are second gaffe of the campaign.” *Toronto Star* (October 1): B.4.
- De Silva, Jan. 2017. “Toronto has space for housing.” *Toronto Star* (March 10).
- Dingman, Shane. 2018. “Toronto’s low-rise neighbourhoods losing density as ‘overhousing’ spreads.” *Globe and Mail* (March 10).
- Dion, Kenneth L. 2001. “Immigrants’ perceptions of housing discrimination in Toronto: The Housing New Canadians project.” *Journal of Social Issues* 57 (3): 523–39.
- Drake Hotel. n.d. “History.” Retrieved September 5, 2016, from <http://www.thedrakehotel.ca/history/>.
- Dufresne, Phillip. 2014. “The Dream Team’s fight against discriminatory bylaws.” Blog. Retrieved from <http://thedreamteam.ca/the-dream-teams-fight-against-discriminatory-bylaws/>
- East York East Toronto Family Resources Organization. n.d. “Rooming House Q&A.” Retrieved February 17, 2017, from <http://www.housingworkers.ca/rent/RENTresources/docs/Rooming%20House%20FAQs.pdf>.
- Falvo, Nick. 2009. *Homelessness, Program Responses and an Assessment of Toronto’s Streets to Homes Program*. [S.I.]: Canadian Policy Research Networks.
- Fiorito, Joe. 2016. “Shelter system braces for a ‘tidal wave’.” *Toronto Star* (August 1): GT.2.
- Freeman, Lisa. 2010. “Three-alarm warning for safety of rooming houses: Etobicoke fire should spur city to act on unlicensed dwellings.” *Toronto Star* (April 14): 25.
- Freeman, Lisa M. 2013. “Making Room: The Geography of Rooming House Regulation in Toronto.” Master’s paper. University of Toronto.
- Freeman, Lisa. 2014. *Toronto’s Suburban Rooming Houses: Just a Spin on a Downtown “Problem?”* Toronto: Wellesley Institute.
- Gaetz, Stephen, Jesse Donaldson, Tim Richter, and Tanya Gulliver. 2013. *The State of Homelessness in Canada 2013*. Toronto: Canadian Homelessness Research Network Press.
- Gallant, Gloria, Joyce Brown and Jacques Tremblay. 2004. *From Tent City to Housing: An Evaluation of the City of Toronto’s Emergency Homelessness Pilot Project*. Toronto.
- Gandhi, Unnati. 2005. “Rooming House Blues.” *Globe and Mail* (December 17).

- Goodmurphy, Brendon, and Kuni Kamizaki. 2011. *A Place for Everyone: How a Community Land Trust could protect affordability and community assets in Parkdale*. Toronto: Parkdale Activity-Recreation Centre.
- Grisdale, Sean. 2018. *Displacement by Disruption: Platform Capitalism, Short-Term Rentals and Urban Transformation in Toronto*. Master's thesis, University of Toronto.
- Hale, Kenneth. 2010, September 30. Re: City of Toronto By-law no. 1156-2010 Appeal pursuant to subs. 34(19) of the planning act, R.S.O. 1990, c. P. 13. Advocacy Centre for Tenants Ontario, Toronto.
- Harvey, Ian. 2014. "The academy takes a new course." *Toronto Star* (May 2).
- HomeComing Community Choice Coalition. 2005. "Yes in My Back Yard: A Guide for Ontario's Supportive Housing Providers." Toronto.
- Hulchanski, J. D. 1997, November 23–26. "Immigrants and Access to Housing: How Welcome are Newcomers to Canada?" Metropolis Year II, The Development of a Comparative Research Agenda—Proceedings of the Second National Conference and of the Thematic Seminar "Housing and Neighbourhood", Montréal, Québec.
- . 2010. *The Three Cities within Toronto: Income Polarization among Toronto's Neighbourhoods, 1970–2005*. Toronto: Cities Centre, University of Toronto.
- Hume, Christopher. 2008. "Lu case is just the beginning." *Toronto Star* (February 9): ID.2-ID2.
- Hwang, Stephen W., Rochelle E. Martin, George S. Tolomiczenko, and J. D. Hulchanski. 2003. "The relationship between housing conditions and health status of rooming house residents in Toronto." *Canadian Journal of Public Health / Revue Canadienne de Santé Publique* 94 (6): 436–40.
- Layton, Mike. 2015, August 31. "Re: Large Single-Room Occupancy Buildings [Letter to Affordable Housing Committee]." *Toronto Star* (Sep 6, 2013): GT.2.
- Levinson, Robin. 2013. "3 Accused in rooming house case head to trial." *Toronto Star* (Sep 6, 2013): GT.2.
- Mahoney, Elinor. 2001. "The Ontario Tenant Protection Act: A trust betrayed." *Journal of Law and Social Policy* 16: 261–278.
- Marshall, Sean. 2015. "Mapping Toronto's legal rooming houses." *Torontoist* (September 3).
- Mayor's Homelessness Action Task Force. 1999. *Taking Responsibility for Homelessness: An Action Plan for Toronto*. Toronto: City of Toronto.
- Milroy, Beth M., Philippa Campsie, Robin Whittaker, and Zoe Girling. 1999. "Who Says Toronto is a 'Good City'?" In *World-Class Cities: Can Canada Play?* eds. Caroline Andrew, Pat Armstrong and Andre Lapierre. Ottawa: University of Ottawa Press, 159.
- Monsebraaten, Laurie. 2010. "New housing for homeless men welcomed." *Toronto Star* (October 15): GT.4.
- Murdie, Robert A. 2002. "The housing careers of Polish and Somali newcomers in Toronto's rental market." *Housing Studies* 17 (3) (May 2002): 423–43.
- Novakovic, Stefan. 2016. "32 storeys proposed at southeast corner of Shuter and Mutual." Retrieved February 6, 2017, from <http://urbanToronto.ca/news/2016/08/32-storeys-proposed-southeast-corner-shuter-and-mutual>
- Ontario Human Rights Commission. 2007. *Human Rights and Rental Housing in Ontario: Background Paper*. Toronto: OHRC.
- . 2008. *Right at Home: Report on the Consultation on Human Rights and Rental Housing in Ontario*. Toronto: OHRC.
- . 2012. *In the Zone: Housing, Human Rights, and Municipal Planning*. Toronto: OHRC.
- . 2013. *Room for Everyone: Human Rights and Rental Housing Licensing*. Toronto: OHRC.
- Ontario Ministry of Municipal Affairs. 2015. "City of Toronto Act, 2006." Retrieved February 11, 2017, from <http://www.mah.gov.on.ca.myaccess.library.uToronto.ca/Page343.aspx>.
- Ontario Ministry of Public Infrastructure Renewal. 2006. *Growth Plan for the Greater Golden Horseshoe (Places to Grow)*. Toronto.
- Oriole Research & Design Inc. 2008. *Shared Accommodation in Toronto: Successful Practices and Opportunities for Change in the Rooming House Sector*. Toronto: Toronto Shelter, Support & Housing Administration.
- Philp, Margaret. 1998. "Ruling bars bias against low-income tenants: Landlords can't set arbitrary ratios on rent." *Globe and Mail* (December 23).

- Parkdale Neighbourhood Land Trust. 2017. *No Room for Unkept Promises: Parkdale Rooming House Study. The impact of real estate speculation, upscaling, and conversion on rooming house loss in Parkdale*. Toronto.
- Pigg, Susan. 2012. "Cabbagetown heritage homes 'disintegrating'." *Toronto Star* (July 10): A.1.
- Powell, Betsy. 2016a. "Room for improvement." *Toronto Star* (October 3): GT.1.
- . 2016b. "Concerns raised over rooming house revamp." *Toronto Star* (October 11): A.1.
- . 2016c. "Rooming house conversions worry housing advocates." *Toronto Star* (October 11).
- . 2016d. "Mayor's executive committee to consider rooming house bylaw." *Toronto Star* (October 25).
- . 2016e. "City staff recommend rooming house bylaw." *Toronto Star* (October 26): GT.3.
- Powell, Betsy, and Alicja Siekierska. 2016. "City eyes legalization of more rooming houses." *Toronto Star* (October 1): GT.1.
- Press, J. 2017. "CMHC looks to Airbnb in bid to boost supply of affordable rental units." *Globe and Mail* ((October 3).
- Province of Ontario. 1997. "Tenant Protection Act."
- . 2000. "Ontario Regulation 339/01 Under the Social Housing Reform Act."
- Public Interest Strategy & Communications Inc. 2017. *City of Toronto Proposed Regulatory and Licensing Strategy for Multi-Tenant Houses: Public Consultation Report*.
- Rayner, Ben. 2017. "Silver Dollar Room set to close in the spring." *Toronto Star* (January 31).
- Robson, Dan. 2011a. "'Only a matter of time' before there's a fire." *Toronto Star* (May 7): GT.4.
- . 2011b. "Behind the Village's doors." *Toronto Star* (May 10).
- Roher, Jessica Simone. 2016. "Zoning out discrimination: Working towards housing equality in Ontario." *Journal of Law and Social Policy* 25: article 2.
- Schoenfeld, Stuart, David Harrison, and Ralph Daley. 2012. "Expanding campus worries neighbours." *Toronto Star* (Jun 24, 2012): A.13.
- Selley, Chris. 2012. "Toronto Community Housing Corporation working group faces harsh political reality." *National Post* (February 7).
- SHS Inc. and Richard Drdla Associates. 2004a. *City of Toronto Rooming House Issues and Future Options: Final Report*. Toronto: City of Toronto.
- . 2004b. *Rooming House Issues and Future Options, Background Report One: Description of the Rooming House Sector*. Toronto.
- . 2004c. *Rooming House Issues and Future Options, Background Report Two: Regulation and Licensing of Rooming Houses in the City of Toronto and Other Jurisdictions*. Toronto.
- Simon, Jennifer. 2009. "Bachelorette Apartments in Parkdale: Evaluation of the Parkdale Pilot Project." Master's paper. University of Toronto.
- Slack, Enid, and Richard Bird. 2013. *Merging Municipalities: Is Bigger Better?* Toronto: Institute on Municipal Finance and Governance, University of Toronto.
- Slater, Tom. 2005. *Toronto's South Parkdale Neighbourhood A Brief History of Development, Disinvestment, and Gentrification*. Research Bulletin No. 28. Toronto: Cities Centre.
- Social Data Research and Christine Davis. 2006. *Profile of Rooming House Residents : Final Report*. Ottawa: Canada Mortgage and Housing Corporation.
- Spurr, Ben. 2015. "Overhaul eyed for rooming house regulations." *Toronto Star* (April 10): GT.2.
- Stone, Laura. 2012. "Illegal homes hard to stop." *Toronto Star* (August 31): GT.1.
- Suttor, Greg. 2016a. *Still Renovating: A History of Canadian Social Housing Policy*. Kingston, Montreal: McGill-Queen's Press.
- . 2016b. *Taking Stock of Supportive Housing for Mental Health and Addictions in Ontario*. Toronto: Wellesley Institute.
- Toronto Community Housing. 2016, July 21. Stand-alone properties – sales and relocation update. Toronto.

Toronto Disaster Relief Committee. n.d. "Homelessness: A National Disaster." Retrieved August 11, 2016, from <http://tdrc.net/index.php?page=state-of-emergency-declaration>.

———2005, July 4. "TDRC Calls for action as boarding house tenant dies in killer heat [Media advisory]."

———2012. "Toronto Disaster Relief Committee: 14 years of advocacy, activism and action." Retrieved October 26, 2016, from <http://tdrc.net/uploads/tdrc14years.pdf>.

Toronto Urban Development Roundtable, Rental Working Group. 2001. *Unlocking the Opportunity for New Rental Housing: A Call to Action*. Toronto: Toronto City Planning Division, Policy and Research.

Truemner, Mary. 2006. *An Overview of the Residential Tenancies Act: A Tenant Advocate's Perspective*. Toronto: Advocacy Centre for Tenants Ontario.

Valverde, Mariana. 2012. *Everyday Law on the Street: City Governance in an Age of Diversity*. Chicago: The University of Chicago Press.

Vincent, Donovan. 2008. "Suburban house split up into 18 bedrooms." *Toronto Star* (February 4).

Walks, Alan. 2012. *Anything but Scattered: The proposed sale of Toronto community Housing's standalone scattered-site housing and implications for building an inclusive Toronto*. Toronto: Neighbourhood Change Research Partnership.

Wellesley Institute. 2011. "Selling off affordable homes is bad for Toronto's health: Seven things you need to know." Toronto. Online backgrounder. Retrieved February 6, 2017, from <http://www.wellesleyinstitute.com/wp-content/uploads/2011/11/TCHC-Housing-Sell-Off-Backgrounder1.pdf>

White, Arthur. 2015. "Last call at the Palace Arms: Developers covet the King West property, but where will its poor tenants go?" *Globe and Mail* (June 26).

Whyte, Murray. 2005. "Less crime, busy streets are bad things? Yes, people hate the class-war implications of gentrification, but sometimes it's better than the alternative." *Toronto Star* (December 4): D.01–D01.

Young, Toby, and Bruce Best. 2003. "'Decisions adverse to a household': Protecting social housing tenants under the Social Housing Reform Act and the Tenant Protection Act." *Journal of Law and Social Policy* 18: 1–45.

17. Interviews

Chip Au, City of Toronto Affordable Housing Office

Deanna Chorney, Toronto City Planning

Joy Connelly

Richard Drdla, Richard Drdla Associates

Rosemary Foulds, City of Toronto

Kenn Hale, Advocacy Centre for Tenants Ontario

Simon Liston, City of Toronto Affordable Housing Office

Phil Nazar, Dixon Neighbourhood Homes

Susan Shepherd, Toronto Public Health

Mohamed Shuriye, City of Toronto Municipal Licensing and Standards

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Alexandra Vamos, Shelter, Support and Housing Administration